

TSD File Inventory Index

Date: April 10, 2001

Initial: CMH/mao

Facility Name: <u>Design Originals, Inc. (Fire Related Site)</u>			
Facility Identification Number: <u>CHD 063 989 545</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments		C.2 Compliance/Enforcement	Y
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports, and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
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.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
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.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
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.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folder per schedule

A.4 Closure/
Post-Closure



State of Ohio Environmental Protection Agency

A.4.1

STREET ADDRESS:

300 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

Re: **CLOSURE PLAN APPROVAL**
DESIGN ORIGINAL
OHD063989545

May 10, 1996

Mr. Frank Pusey, Owner
Design Original, Inc.
402 Jackson Street
Jackson Center, Ohio 45334-0813

Dear Mr. Pusey:

On May 11, 1994, Design Original, Inc. submitted to Ohio EPA a closure plan for a Hazardous waste disposal area, an unpermitted storage unit located at 402 Jackson Street, Jackson Center, Ohio. Revisions to the closure plan were submitted on December 7, 1995 and December 19, 1995. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Design Original, Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Design Original, Inc. in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of Design Original, Inc.'s submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at 402 Jackson Street, Jackson Center, Ohio meets the performance standard contained in OAC 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The revised closure plan submitted to Ohio EPA on December 19, 1995 by Design Original, Inc. is hereby approved.

Please be advised that approval of this closure plan does not release Design Original, Inc. from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective actions for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Kara Yoder Date 5/10/96

OHIO E.P.A.

MAY 10 96

ENTERED DIRECTOR'S JOURNAL

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

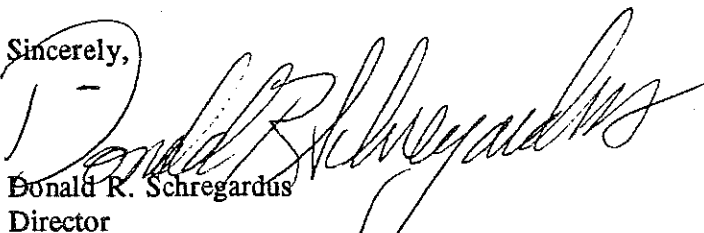
Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages; to undertake any removal, remedial, and/or response action relating to the facility; and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42(D), and should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attention: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049.

Sincerely,


Donald R. Schregardus
Director

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Kara Yaki Date 5/10/96

cc: Tom Crepeau, OEPA, DHWM Central File
Montee Suleiman, OEPA, DHWM, CO
Harriet Croke, Ohio Permit Section, USEPA, Region V
Harold O'Connell, OEPA, Southwest District Office
James Parrish, Springfield Environmental, Inc.

OHIO E.P.A.

MAY 10 96

ENTERED DIRECTOR'S JOURNAL



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

NOTICE OF DEFICIENCY

CERTIFIED MAIL

November 25, 1994

RECEIVED
MAIL RECORD CENTER

FEB 21 1995

RE: CLOSURE PLAN
Design Original, Inc.
OHD 063 989 545

Design Original, Inc.
Attn. Mr. Frank Pusey
402 Jackson Street
Jackson Center, Ohio 45334-0813

Dear Mr. Pusey:

On May 11, 1994, Ohio EPA received from Design Original, Inc. a closure plan for a hazardous waste disposal area, an unpermitted disposal unit located at 402 Jackson Street, Jackson Center, Ohio.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Design Original Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule 3745-66-12. The public comment period extended from June 6, 1994 through July 15, 1994. No public comments were received by Ohio EPA.

Pursuant to OAC Rule 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.



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Mr. Frank Pusey
Design Original, Inc.
Page Two

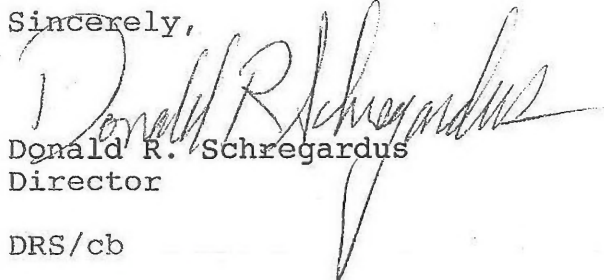
The modified closure plan shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck, but not obliterated.
2. New language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attention: Tom Crepeau, Data Management Section, P.O. Box 163669, Columbus, Ohio 43216-3669. A copy should also be sent to: Chris Budich, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, Ohio 45402.

Upon review of the resubmitted plan, I will prepare and issue a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Chris Budich at (513) 285-6094.

Sincerely,



Donald R. Schregardus
Director

DRS/cb

cc: Tom Crepeau, OEPA, DHWM Central File
Montee Suleiman, OEPA, DHWM
Harriet Croke, Ohio Permit Section, USEPA, Region V
Chris Budich, OEPA, Southwest District Office
George Momirov, Regency Environmental

ATTACHMENT A

DESIGN ORIGINAL, INC.
HAZARDOUS WASTE DISPOSAL AREA

OHD 063 989 545

SPECIFIC COMMENTS:

1. The closure plan must include a statement acknowledging the requirement for closure certification by both the owner\operator and an independent registered engineer licensed in Ohio pursuant to Ohio Administrative Code (OAC) section 3745-66-15. The owner\operator statement must include the exact wording found in OAC section 3745-50-42(D).
2. On page 1, section 1.3, the closure plan specifies the dimensions of the area to be closed as 20 feet long by 16 feet wide. On page 6 of the closure plan, the Remediation Site Plan, the area to be closed is shown to be 20 feet by 15 feet. Page 6 of the Remediation Site Plan also indicates that toluene was detected in samples D-4 and D-8 but this area is not included in the area to be closed. The closure plan does not explain how the boundaries for the contamination area were established. Design Originals, Inc. must provide additional information to adequately define the extent of contamination at the site. This information must be provided pursuant to OAC 3745-66-12.
3. On page 2, section 1.3, the closure plan states that concentrations of chrome and lead are nearly all within natural background ranges and would not be of concern in this remediation project. On page 19 of the closure plan, an excerpt from ERM-Midwest Inc.'s report of May 21, 1991, samples D-1 and D-5 were shown to have concentrations of lead and chromium, respectively, above background levels as established in "Background Levels of Heavy Metals in Ohio Farm Soils", 1983, Research Circular 275, Ohio State University, Wooster, Ohio which was used as a reference in the closure plan. Design Original shall revise the closure plan to address the clean-up standards for lead and chromium; either use Ohio Farm Soils which is 29 mg/kg for lead and 20 mg/kg for chromium, or establish on-site background standards. These levels of lead and chromium must be addressed in the closure plan pursuant to OAC 3745-66-12(B)(4).
4. On page 10, section 3.5 of the closure plan it states that "standard procedure" will be followed to decontaminate equipment used in the project. Design Original, Inc. must provide a detailed description of the decontamination steps

pursuant to OAC 3745-66-12(B)(4).

5. On pages 22-29 of the closure plan, laboratory results are provided for three samples collected July 28, 1993 and a trip blank. These results indicate the detection of methylene chloride, chlorobenzene, xylene, acetone, methyl isobutyl ketone, methyl ethyl ketone, and benzene. None of these organic constituents were detected in the trip blank. These constituents must be addressed in the closure plan pursuant to OAC 3745-66-12(B)(2).

END OF CLOSURE COMMENTS



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

TRACKING - DHWM, CM&ES

TO GO ON: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ FILE
ENTERED: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ ONLY
RCRIS ENTRY CODES: (EVALUATION) 009 (ENFORCEMENT) 005
CEI ☐ CI ☐ OTHER REL INITIAL NOV ☐ FOLLOW-UP NOV ☐
FULL RTC ☐ PARTIAL RTC ☐ LDR ☐ SENT TO USEPA: YES ☐ NO ☐

Donald R. Schregardus
Director

MEMORANDUM

RECEIVED **DEC 16 1993**
WMD RCRA
RECORD CENTER

TO: Financial Assurance File
FROM: Tina Jennings through Laurie Stevenson, Supervisor, CM&ES, DHWM
SUBJECT: Design Originals Financial Assurance - **OHD063989545**
DATE: October 18, 1993

Due to past hazardous waste disposal activities conducted on-site, Design Originals is considered a land disposal facility. On June 13, 1990 and June 28, 1991, Ohio EPA conducted a review of financial assurance documents for Design Originals to evaluate compliance with Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-47. Pursuant to OAC rules 3745-66-42 through 3745-66-47, Design Originals must establish and maintain closure cost estimates, financial assurance for closure, and liability coverage for the Jackson Center, Ohio facility. It was determined that Design Originals was in violations of the aforementioned OAC rules in that no documentation of compliance had been submitted to Ohio EPA.

On October 13, 1993, Ohio EPA conducted a financial record review to determine Design Originals compliance with financial assurance and liability rules 3745-66-42, 3745-66-43 and 3745-66-47 of the OAC. To date, Design Originals has not submitted financial assurance documentation to determine compliance with financial assurance and liability requirements.

Design Originals has been notified of financial assurance violations in Notice of Violation (NOV) letters dated September 8, 1989, June 15, 1990 and July 2, 1991. Design Originals has failed to respond to these NOV's.

The criminal case was resolved by the Ohio Attorney General, however, the civil case has not yet been resolved.

wp.TJ.LS.lcn.designmemo

cc: Laurie Stevenson, CM&ES, DHWM
Pamela Allen, CM&ES, DHWM
Mark Metcalf, DHWM, SWDO
Chris Costantini, AGO/EES



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A 415



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

July 2, 1991

Re: **Design Originals**
OHD063989545
Financial Assurance

Frank Pusey
Design Originals
402 Jackson Street
P.O. Box 357
Jackson Center, OH 45334

RECEIVED

AUG 28 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Pusey:

On June 28, 1991 Ohio EPA conducted a review of financial assurance documents for Design Originals to evaluate compliance with rules 3745-66-42 through 3745-66-47 of the Ohio Administrative Code (OAC). Design Originals is operating a hazardous waste facility as defined in OAC rule 3745-50-10(A)(32) and is subject to the financial assurance and liability coverage requirements until final closure is approved by Ohio EPA. Pursuant to OAC rules 3745-66-42 through 3745-66-47, Design Originals establish and maintain closure and post-closure cost estimates, financial assurance for closure and post-closure care, and liability coverage for its Jackson, Ohio facility referenced above.

Based on this review, Ohio EPA has determined that Design Originals remains in violation of the aforementioned rules of the OAC in that no documentation of compliance has been submitted to Ohio EPA.

These and other issues are currently being addressed at the Ohio Attorney General's Office. If you have any questions concerning this matter, please call me at (614) 644-2934.

Sincerely,

Carolyn Reiersen

Carolyn Reiersen
Hazardous Waste Enforcement Section
Division of Solid and Hazardous Waste Management

Sp.CR.lcn

cc: Laurie Stevenson, HWES, DSHM
Pamela Allen, Manager, HWES, DSHM
Paul Pardi, DSHM, SWDO
Chris Costantini, AAG/EES, Office of the Attorney General

CLOSURE PLAN

for

**DESIGN ORIGINAL, INCORPORATED
402 JACKSON STREET
JACKSON CENTER, OHIO**

**PREPARED BY: JAMES E. PARRISH
LOCKWOOD LABORATORIES / SPRINGFIELD ENVIRONMENTAL, INC.
PO BOX 2728
SPRINGFIELD, OHIO 45501-2728
513 / 324-8001**

NOVEMBER 30, 1995

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 - 1.1 HISTORY AND BACKGROUND
 - 1.2 PLAN OBJECTIVES
 - 1.3 SITE PLAN
 - 1.4 CLEANUP TARGET LEVELS
- 2.0 SITE SAFETY AND SECURITY
 - 2.1 SITE SAFETY PLAN
 - 2.2 CONTINGENCY PLAN
 - 2.3 EMERGENCY MEASURES
- 3.0 SCOPE OF WORK
 - 3.1 EXCAVATION OF CONTAMINATED ZONE
 - 3.2 TREATMENT AND DISPOSAL OF CONTAMINATED SOIL
 - 3.3 ON-SITE TESTING
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- 5.0 FINANCIAL ASSURANCE

1.0 INTRODUCTION

1.1 HISTORY AND BACKGROUND

This plan is in response to a "Notice of Deficiency" (NOD) dated November 25, 1994 from Donald R. Schregardus, Director of the Ohio Environmental Protection Agency (OEPA). In addition, a previous Closure Plan dated September 15, 1993 (and amended Jan. 4, 1994) was never corrected to satisfy the NOD. This plan corrects the previous deficiencies and responds to an "Enforcement Action" by the Ohio EPA on the owner of this company at 402 Jackson Street in Jackson Center, Ohio.

It should be noted that this is a new Closure Plan and not a modification to the one submitted by Regency Environmental, Inc.

The deficiencies noted in the OEPA Notice of Deficiency are addressed as follows:

- | | |
|----|-----------------|
| #1 | See Section 4.4 |
| #2 | See Section 1.3 |
| #3 | See Section 1.4 |
| #4 | See Section 3.4 |
| #5 | See Section 1.4 |

Design Original is a manufacturer of stitched embroidery and printed wearing apparel. The processes involved are stitching and silk screening. The silk screening process utilizes solvent based inks. Cleanup of the screens involves the use of toluene. The Generator Identification Code for this company is OHD063989545.

The manufacturing operations are housed in a one story building built on a concrete slab.

The Waste Management Unit (WMU) is an area outside the west side of the building and adjacent to the building where silk screens were cleaned with toluene. Subsequent testing of the soil in this area has shown that an area approximately 35 by 16 feet is contaminated with toluene (F005) to a depth of about 4 feet. In addition, a few "hot spots" exist near the surface where lead and chromium readings are above background levels and certain other ink solvents have been detected.

The WMU is characterized by a layer of crushed stone approximately 2-3 inches deep and a subsoil consisting mainly of clay.

1.2 PLAN OBJECTIVES

This plan will satisfy the closure requirements stated in the Ohio Environmental Protection Agency Code 3745-66.

Lockwood Laboratories / Springfield Environmental, Inc. (LL/SEI) will attempt to accomplish the following remediation objectives:

- a) Remove approximately 60 cubic yards of contaminated soil.
- b) Sample, test and characterize the waste profile of the removed soil.
- c) Transfer the removed soil to a licensed disposal site.
- d) Develop and obtain all necessary permits.
- e) Determine the extent of soil removal necessary by use of HNu Photoionization Detection (PID) test unit on site.
- f) Backfill with clean fill material.
- g) Develop and implement the site safety and security plans.
- h) Prepare the final closure report.

1.3 SITE PLAN

See Figure 1.3 attached. The site is located at 402 Jackson Street in Jackson Center, Ohio. The cleanup will encompass an area approximately 35 by 16 feet including points 4 and 8 which were mentioned in item #2 of the "Specific Comments" in the Notice of Deficiency.

1.4 CLEANUP TARGET LEVELS

The target levels for cleanup of this WMU are as follows:

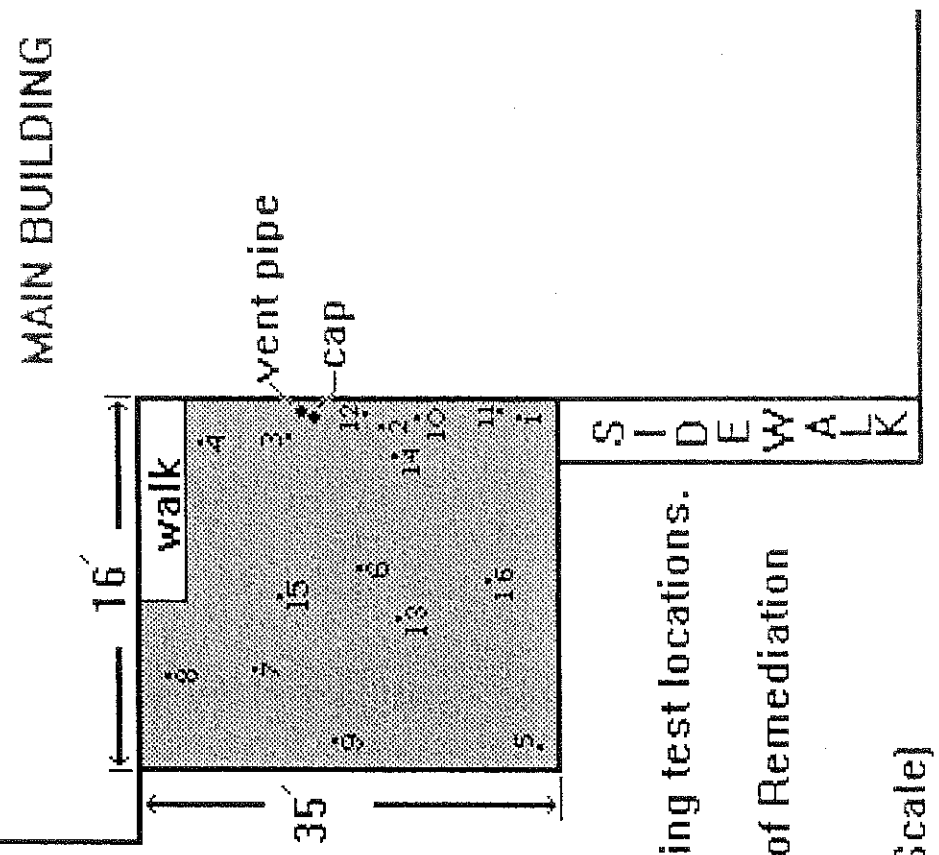
Toluene	Non Detectable
Lead	29.0 ppm (Ohio Farm Soils)
Chromium	20.0 ppm " " "
Methylene Chloride*	Non Detectable
Chlorobenzene*	"
Xylene*	"
Acetone*	"
Methyl Isobutyl Ketone*	"
Methyl Ethyl Ketone*	"
Benzene*	"
Ethyl Benzene*	"

*These solvents were detected in tests conducted in 1993.

The levels of Lead and Chromium selected for cleanup targets are those found as "Background Levels of Heavy Metals in Ohio Farm Soils", 1983, Research Circular #275, Ohio State University, Wooster, Ohio. This satisfies "Specific Comment #3", in the Notice of Deficiency. It also satisfies the requirements listed in OAC 3745-66-12 (B) (4).

The above also addresses "Specific Comment #5" in the Notice of Deficiency by targeting cleanup levels for the solvents found in the 1993 testing (OAC 3745-66-12(B) (2).

FIGURE 1.3

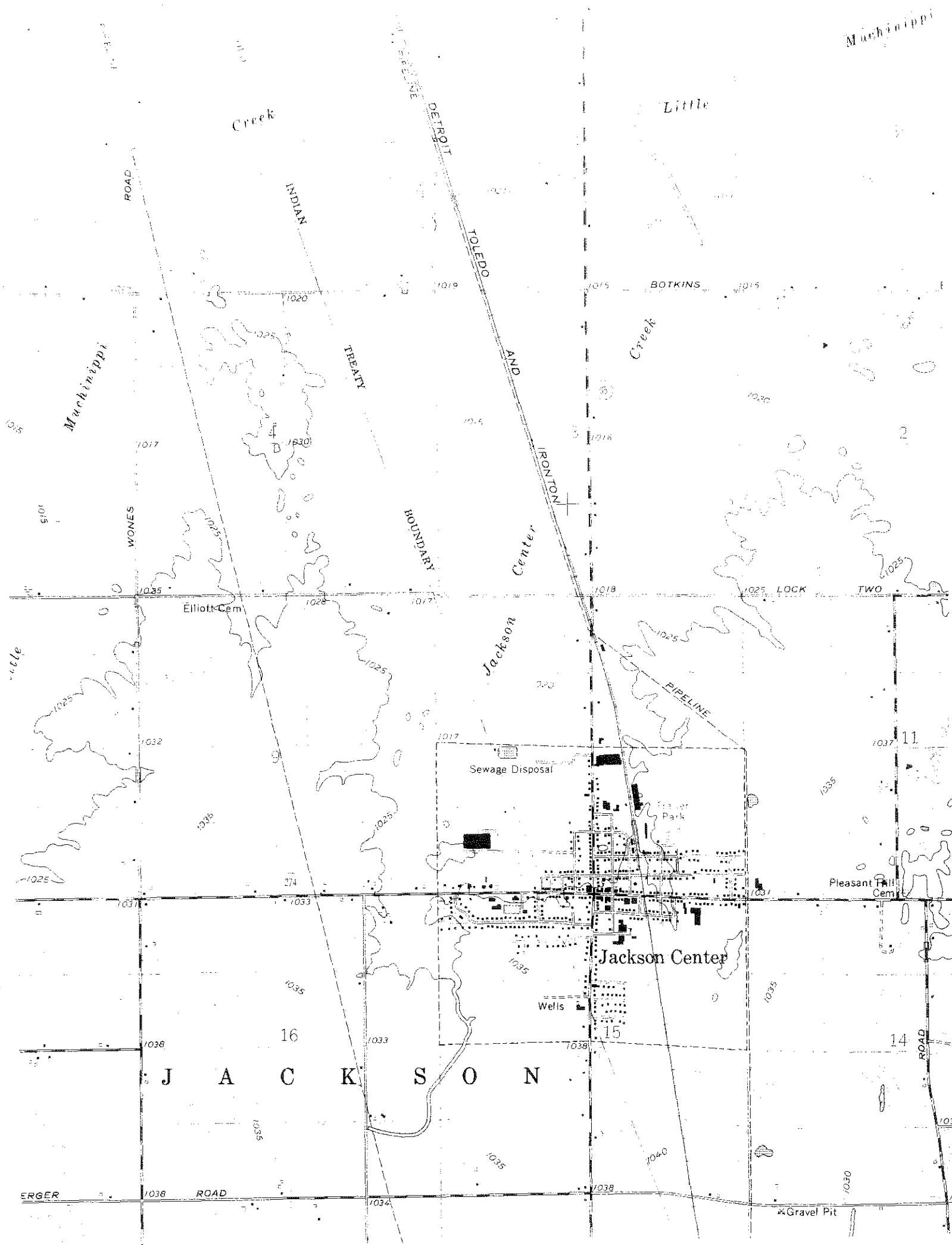


Numbers refer to soil boring test locations.

● Approximate Area of Remediation

(Not to Scale)

Mississippi



2.0 SITE SAFETY AND SECURITY PLAN

2.1 SITE SAFETY PLAN

A) GENERAL INFORMATION

SITE: Design Original, Incorporated

ADDRESS: 402 Jackson Street
Jackson Center, Ohio 45334-0813

PREPARED BY: James E. Parrish, Environmental Engineer
Lockwood Laboratories / Springfield Environmental, Inc.
P. O. Box 2728
1001 East Street
Springfield, Ohio 45501-2728

OVERALL HAZARD: SERIOUS _____ MODERATE _____
LOW XXX UNKNOWN _____

SITE DESCRIPTION: Relatively level terrain with no overhead obstruction.

B) SITE WASTE CHARACTERISTICS

WASTE TYPE: Solid (Soil contaminated with toluene).

C) HAZARD EVALUATION

Site hazards are very low. There are no underground or overhead electrical lines, no chemical hazards nor any mechanical hazards associated with this remediation plan. There may be a slight fire hazard associated with the remediation of solvent laden soil. However, the low concentration of solvents should not present an explosive or respiratory hazard.

D) SITE SAFETY WORK PLAN

PERIMETER ESTABLISHMENT

MAP/SITE PLAN ATTACHED:	YES
SITE SECURED:	YES, Site will be secured with yellow caution tape limiting access to remediation workers. No smoking or open flame will be permitted.
PERSONAL PROTECTION:	Level "D": Tyvek oversuit with gloves. No breathing protection will be required because of the low concentrations of contaminants.
MODIFICATIONS:	None required. Level "D" with gloves will suffice.
ACTIONS:	If organic vapor concentration at breathing zone rises to hazardous level, workers will be removed from the site and instructed to go to Level "C".
SPECIAL EQUIPMENT FACILITIES PROCEDURES:	None.
SITE ENTRY:	To be arranged with Project Manager.
WORK LIMITATIONS	Daylight Hours.
CLOSURE DERIVED WASTES:	All equipment will be hosed down at the site. All wastes and contaminated soils will remain at the work site until released for disposal. Personal protective clothing will be quarantined and remain with the soil until released for disposal.
EMERGENCY INFORMATION:	
PROJECT MANAGER:	James E. Parrish, Lockwood Labs (513)324-8001
FACILITY MANAGER:	Frank Pusey, Design Original, Inc. (513)596-5121
PROJECT TECHNICIAN:	Fred Fitzsimmons, Lockwood Labs (513)324-8001
FIRE:	Jackson Center Fire Department 911
POLICE:	Jackson Center PD 911 Shelby County Sheriff (513)498-1111
HOSPITAL:	Wilson Memorial (Sidney) (513)492-7296
OHIO EPA:	Chris Budich, SW District Office (513)285-6357

2.2 CONTINGENCY PLAN

The contingency plan is formulated in order to have pre-planned actions minimizing hazards in case of fire, explosion or any unplanned release of hazardous waste into the environment whether air, soil, surface water or aquifer. The contingencies are planned for all activities associated in executing the remediation objectives.

Implementation of the Contingency Plan

The Project Manager has full authority in case of an emergency during the execution of the Remediation Plan. The following potential situations may trigger implementation of the Contingency Plan:

Explosion

Although highly unlikely, an explosion could possibly occur. All personnel will be evacuated.

Fire

The probability that a fire could occur is low. If a fire does breakout, uncontaminated soil would be used to smother the fire.

Air Release

Air releases of a minor nature will occur during excavation. If the concentrations reach hazardous proportions, personnel will be removed from the area and outfitted with "C" level protection.

2.3 EMERGENCY MEASURES

The measures listed here will be followed for all non-acute emergencies:

- 1) All employees discovering an emergency shall notify the Project Manager.
- 2) The Project Manager, in concert with the Facility Manager, will assess the severity of the emergency and contact the appropriate emergency personnel.
- 3) The Project Manager and the Facility Manager will take the necessary steps to contain the hazard and secure the site.
- 4) The project Manager will take all necessary steps to inform all emergency personnel of the hazardous nature of the site.

- 5) All non-essential personnel will be removed from the area until the emergency is under control. Project personnel will meet at the street near the railroad tracks, until the Project Manager determines it is safe to resume work.
- 6) The Project Manager will ensure all contaminated wastes from emergency personnel are collected and contained after the emergency is brought under control. (Tyvek suits, gloves absorbents etc.)
- 7) The Project Manager and the Facility Manager will ensure that all on-site equipment is restored to pre-emergency condition before remediation is continued.
- 8) The Project Manager and the Facility Manager will investigate the cause of the emergency and provide an irreversible solution to prevent a reoccurrence.

SITE SAFETY PLAN ACKNOWLEDGMENT FORM

<u>PRINT NAME</u>	<u>SIGNATURE</u>	<u>REPRESENTING</u>	<u>DATE</u>
_____	_____	_____	_____
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_____	_____	_____	_____

SOIL BORING DATA

All data in parts per million (milligrams per Kilogram)

LOCATION	DEPTH	DATE	TOLUENE*	LEAD*	CHROMIUM*
1	0 TO 6"	10/25/90	ND	41	6
1	24" TO 36"	10/25/90	0.051	41	17
2	0 TO 6"	10/31/90	ND	25	15
2	24" TO 36"	10/25/90	78	14	16
3	0 TO 6"	10/25/90	10.3	13	12
3	24" TO 36"	10/25/90	3.2	27	17
4	0 TO 6"	10/25/90	0.007	13	16
4	24" TO 36"	10/25/90	0.008	25	15
5	0 TO 6"	10/25/90	ND	39	28
5	24' TO 36"	10/25/90	36	27	22
6	0 TO 6"	10/25/90	3.7	27	19
6	24" TO 36"	10/31/90	819	28	19
7	0 to 6"	10/25/90	2.5	13	18
7	24" to 36"	10/25/90	1.24	27	17
8	0 to 6"	10/25/90	0.01	26	18
8	24" to 36"	10/25/90	1.34	27	18
9	0 to 6"	10/31/90	0.08	29	19
9	24" to 36"	10/25/90	2.9	14	23
10	24" to 36'	10/25/90	1040	27	23
11	36"	8/16/93	0.104*		
12	36'	8/16/93	0.087*		
13	36"	8/16/93	18.100*		
14	0 to 24"	11/6/95	0.142	22.75	7.98
14	24" to 48"	11/6/95	1.600	7.95	8.61
15	0 to 24"	11/6/95	0.351	64.0	17.8
15	24" to 48"	11/6/95	0.058	20.89	15.07
16	0 to 24"	11/6/95	68,300	15.66	14.29
16	24" to 48'	11/6/95	78.800	8.55	13.52

* Also saw evidence of methylene chloride, chlorobenzene, xylene, acetone, MIBK, MEK, benzene and ethylbenzene.

ND = Non Detectable

Bold numbers represent levels above the cleanup target levels.

3.0 SCOPE OF WORK

3.1 EXCAVATION OF CONTAMINATED ZONE

The site plan, shown as Figure 1.3, shows the area to be excavated as the shaded area of the plan. Soil depth removed will be approximately 48". However, soil depth removed will be determined in the field using an HNu Photoionization Detection (PID) instrument calibrated to toluene. A target concentration of <1.0 parts per million (1.0 mg/Kg) as measured by the PID will be adopted.

The excavation at the building edge will be tailored to angle off at 45° from the bottom of the slab so as not to compromise the structural integrity of the building.

3.2 TREATMENT AND DISPOSAL OF CONTAMINATED SOIL

The contaminated soil will eventually be transported to a certified landfill for disposal. The removed soil will be sampled and tested in the lab for hazardous characteristics. If the test results are below standards, the soil will be landfilled. If not, the soil will be stored on an impervious surface until other arrangements can be made. The other arrangements may include thermal desorption, incineration or bioremediation. If the soil must be disposed as hazardous waste, delisting options will be explored.

3.3 ON-SITE TESTING

After removal of the contaminated soil, the floor of the cavity will be sampled at six locations. The samples will be iced down in coolers for transportation back to Lockwood Laboratories and subsequent testing for toluene via EPA testing protocol SW 846 method 8020.

3.4 DECONTAMINATION

Decontamination will be accomplished by hosing down the backhoe bucket and tires with a high pressure nozzle and collecting the residual water in a plastic "visqueen moat". The water will be pumped into a drum and subsequently tested for hazardous characteristics. The test results will dictate the disposal procedure for the water. If hazardous, the water will be transported and disposed as hazardous waste at a certified disposal facility. The visqueen used for the moat will be kept with the removed soil until final disposition. Care will be taken to prevent transfer of any contaminated soil from the site on any of the equipment used. This would include any debris such as personal protective clothing and gloves. These will be deposited and disposed with the contaminated soil.

The above satisfies "Specific Comment #4" in the Notice of Deficiency.

3.5 EQUIPMENT

Equipment on site will include a backhoe, approximately 5, 20 cubic yard rolloff containers, an HNu Photoionization testing meter, appropriate sampling equipment, a quantity of plastic visqueen, a hose with a high pressure nozzle for decontamination and a drum for collecting the decontamination water.

4.0 PROJECT MANAGEMENT

4.1 TIME TABLE

The actual excavation can be accomplished in one day. The sub contracting, leasing and scheduling of the backhoe and rolloffs will take approximately two weeks once the project is approved by all parties. Testing of the post removal samples will consume an additional week and final disposition should be decided within two weeks of the excavation. Acceptance of the waste at the landfill will be determined by the "Hazardous Waste Profile" of the contaminated soil.

4.2 ENGINEERING RESPONSIBILITY

Engineering decisions at the site will be the responsibilities of the Project Manager. Within sixty days of final disposal of the removed soil and subsequent closure with clean backfill, the project Manager will prepare a Certification of Final Closure for submission to the Director of the Ohio EPA by registered mail. The certificate will state that the hazardous waste management unit was closed in accordance with the approved closure plan.

4.3 COST ESTIMATES

	\$
Preliminary Testing and Closure Plan Preparation	2200.00
Excavation Including Equipment Mobilization	1300.00
Roll-off Leasing Fees 6 units @ 200\$/week for 2 weeks	2400.00
Roll off Delivery and Transportation to Landfill 6 @ 425	2520.00
Hazardous Waste Laboratory Profile 6 @ \$850	5100.00
Project Manager/Engineer 10 hr. @ \$75	750.00
Project Technician 10 hr. @ \$35	350.00
Post Closure Certification Testing 3 @ \$650	1950.00
Disposal Fees (assuming disposal as F005) 60 yards @ \$390 / yd	23,400.00
Totals	\$39,970.00

4.4 CERTIFICATION

Both the Owner and a Registered Professional Engineer will sign off on the following statement when the closure has been completed.

This paragraph satisfies the requirements listed in The Ohio Administrative Code 3745-50-42.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of

the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

The above satisfies #1 of the “Specific Comments” noted in the Notice of Deficiency dated Nov. 25, 1994.

5.0 FINANCIAL ASSURANCE

Design Original, Inc. will provide financial assurance that the Closure Plan shall be executed through The “Financial Test” noted in 40 CFR Part 265 Subpart “H”.

Table 1

Analytical Results
Soil Sampling
Design Original, Inc.
Jackson Center, Ohio
October 24, 25 & 31, 1990

Results Reported in Dry Weight (mg/kg)

Sample ID	Sample Depth (inches)	Total Chromium	Total Lead	Toluene
D-1	0-6"	6	41	BQL
D-1	24-36"	17	41	0.051
D-2(A)	0-6"	15	25	BQL
D-2	24-36"	16	14	78
D-3	0-6"	12	13	10.3
D-3	24-36"	17	27	3.2
D-4	0-6"	16	13	0.007
D-4	24-36"	15	25	0.008
D-5	0-6"	28	39	BQL
D-5	24-36"	22	27	36
D-6	0-6"	19	27	3.7
D-6(A)	24-36"	19	28	819
D-7	0-6"	18	13	2.5
D-7	24-36"	17	27	1.24
D-8	0-6"	18	26	0.010
D-8	24-36"	18	27	1.34
D-9(A)	0-6"	19	29	0.080
D-9	24-36"	23	14	2.9
D-10	24-36"	23	27	1040

Note:

BQL = Below Quantitation Limit

(A) = Replacement Samples taken 10/31/90

Sample D-10, 24"-36" is a duplicate sample of D-2, 24"-36"

Lab Analysis by Kemron Environmental Services

L. BORATORY RESULTS

RCP, INC.

2246 S. Hamilton Rd. 6603-1214 Tanglewood Bay Dr.
P.O. Box 32454 Orlando, Florida 32821
Columbus, Ohio 43232 (407) 238-1614
(614) 864-6123
EPA Approval No. 4160

SAMPLE NO. 93-0210
DATE RECEIVED 08-06-1993
DATE OF REPORT 08-13-1993
PAGE 1

CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth
Location #1; Collected: 7/22

ANALYSIS	RESULTS	UNITS	METHOD
001			
tetrachloroethylene	< 5.0	ug/kg	SW-846 / 8240
trichloroethylene	< 5.0	ug/kg	SW-846 / 8240
ethylene Chloride	74.2	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
carbon Tetrachloride	< 5.0	ug/kg	SW-846 / 8240
halogenated Fluorocarbons	<10.0	ug/kg	SW-846 / 8240
002			
tetrachloroethylene	< 5.0	ug/kg	SW-846 / 8240
ethylene Chloride	74.2	ug/kg	SW-846 / 8240
trichloroethylene	< 5.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
chlorobenzene	11.6	ug/kg	SW-846 / 8240
1,2-Dichloro-			
2,2-Trifluoroethane	<10.0	ug/kg	SW-846 / 8240
2-Dichlorobenzene	< 5.0	ug/kg	SW-846 / 8240
trichlorofluoromethane	<10.0	ug/kg	SW-846 / 8240
1,2-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
003			
ylene	5.5	ug/kg	SW-846 / 8240
etone	218.0	ug/kg	SW-846 / 8240
thyl Acetate	< 5.0	ug/kg	SW-846 / 8240
thyl Benzene	< 5.0	ug/kg	SW-846 / 8240
thyl Ether	< 5.0	ug/kg	SW-846 / 8240
ethyl Isobutyl-			
etone	16.1	ug/kg	SW-846 / 8240
-Butyl Alcohol	<50.0	ug/kg	SW-846 / 8240
cyclohexanone	<50.0	ug/kg	SW-846 / 8270
ethanol	<250.0	ug/kg	SW-846 / 8240
004			
resols	< 333	ug/kg	SW-846 / 8270
resylic Acid	< 333	ug/kg	SW-846 / 8270
nitrobenzene	< 333	ug/kg	SW-846 / 8270
005			
ol one	104.0	ug/kg	SW-846 / 8240
ethyl Ketone	61.3	ug/kg	SW-846 / 8240
carbon Disulfide	<10.0	ug/kg	SW-846 / 8240
isobutanol	<50.0	ug/kg	SW-846 / 8240

RCP, INC.

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LABORATORY RESULTS

SAMPLE NO. 93-0210
 DATE RECEIVED 08-06-1993
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CLIENT INFORMATION

Agency Enviro, Inc.
 P.O. Box 43221
 Columbus, OH 43221
 George Komarov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth
 Location #1; Collected: 7/93

ANALYSIS	RESULTS	UNITS	METHOD
----------	---------	-------	--------

Acetone	<100.0	ug/kg	SW-846 / 8240
Chloroform	<5.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	<20.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	<10.0	ug/kg	SW-846 / 8240

Respectfully

Steve Alexander

Laboratory Manager



RCP, INC.

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P.O. Box 32454 Orlando, Florida 32821
Columbus, Ohio 43232 (407) 238-1614
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EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO.	93-0211
DATE RECEIVED	08-06-1993
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CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth
Location #2; Collected: 7/28

ANALYSIS	RESULTS	UNITS	METHOD
F001			
Tetrachloroethylene	< 5.0	ug/kg	SW-846 / 8240
Trichloroethylene	< 5.0	ug/kg	SW-846 / 8240
Methylene Chloride	33.8	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
Carbon Tetrachloride	< 5.0	ug/kg	SW-846 / 8240
Chlorinated Fluorocarbons	<10.0	ug/kg	SW-846 / 8240
F002			
Tetrachloroethylene	< 5.0	ug/kg	SW-846 / 8240
Methylene Chloride	33.8	ug/kg	SW-846 / 8240
Trichloroethylene	< 5.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
Chlorobenzene	10.2	ug/kg	SW-846 / 8240
1,1,2-Trichloro-			
1,2,2-Trifluoroethane	< 5.0	ug/kg	SW-846 / 8240
1,2-Dichlorobenzene	< 5.0	ug/kg	SW-846 / 8240
Trichlorofluoromethane	<10.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
F003			
Xylene	< 5.0	ug/kg	SW-846 / 8240
Acetone	145.0	ug/kg	SW-846 / 8240
Ethyl Acetate	< 5.0	ug/kg	SW-846 / 8240
Ethyl Benzene	< 5.0	ug/kg	SW-846 / 8240
Ethyl Ether	< 5.0	ug/kg	SW-846 / 8240
Methyl Isobutyl-			
Ketone	< 5.0	ug/kg	SW-846 / 8240
n-Butyl Alcohol	<50.0	ug/kg	SW-846 / 8240
Cyclohexanone	<50.0	ug/kg	SW-846 / 8270
Methanol	<250.0	ug/kg	SW-846 / 8240
F004			
Cresols	< 333	ug/kg	SW-846 / 8270
Cresylic Acid	< 333	ug/kg	SW-846 / 8270
Nitrobenzene	< 333	ug/kg	SW-846 / 8270
F005			
Toluene	87.4	ug/kg	SW-846 / 8240
Ethyl Ethyl Ketone	<10.0	ug/kg	SW-846 / 8240
Carbon Disulfide	<10.0	ug/kg	SW-846 / 8240
Isobutanol	<50.0	ug/kg	SW-846 / 8240



RCP, INC.

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EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO. 93-0212
DATE RECEIVED 08-06-1993
DATE OF REPORT 08-13-1993
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CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth; Location #3
Collected: 7/28/93

ANALYSIS	RESULTS	UNITS	METHOD
Pyridine	<5000.0	ug/kg	SW-846 / 8240
Benzene	<250.0	ug/kg	SW-846 / 8240
2-Ethoxyethanol	<1000.0	ug/kg	SW-846 / 8240
2-Nitropropane	<500.0	ug/kg	SW-846 / 8240

DP# _____

Respectfully


Laboratory Manager



RCP, INC.

2246 S. Hamilton Rd. 6603-1214 Tanglewood Bay Dr.
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LABORATORY RESULTS

SAMPLE NO.	93-0212
DATE RECEIVED	08-06-1993
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CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth; Location #
Collected: 7/28/93

ANALYSIS	RESULTS	UNITS	METHOD
F001			
Tetrachloroethylene	<250.0	ug/kg	SW-846 / 8240
Trichloroethylene	<250.0	ug/kg	SW-846 / 8240
Methylene Chloride	<500.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
Carbon Tetrachloride	<250.0	ug/kg	SW-846 / 8240
Chlorinated Fluorocarbons	<500.0	ug/kg	SW-846 / 8240
F002			
Tetrachloroethylene	<250.0	ug/kg	SW-846 / 8240
Methylene Chloride	<500.0	ug/kg	SW-846 / 8240
Trichloroethylene	<250.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
Chlorobenzene	<250.0	ug/kg	SW-846 / 8240
1,1,2-Trichloro-			
1,2,2-Trifluoroethane	<250.0	ug/kg	SW-846 / 8240
1,2-Dichlorobenzene	<250.0	ug/kg	SW-846 / 8240
Trichlorofluoromethane	<500.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
F003			
Xylene	<250.0	ug/kg	SW-846 / 8240
Acetone	<1000.0	ug/kg	SW-846 / 8240
Ethyl Acetate	<250.0	ug/kg	SW-846 / 8240
Ethyl Benzene	250.0	ug/kg	SW-846 / 8240
Ethyl Ether	<250.0	ug/kg	SW-846 / 8240
Methyl Isobutyl-			
Ketone	<250.0	ug/kg	SW-846 / 8240
n-Butyl Alcohol	<2500.0	ug/kg	SW-846 / 8240
Cyclohexanone	<2500.0	ug/kg	SW-846 / 8270
Methanol	<250.0	ug/kg	SW-846 / 8240
F004			
Cresols	< 333	ug/kg	SW-846 / 8270
Cresylic Acid	< 333	ug/kg	SW-846 / 8270
Nitrobenzene	< 333	ug/kg	SW-846 / 8270
F005			
Toluene	18,100	ug/kg	SW-846 / 8240
Ethyl Ethyl Ketone	<500.0	ug/kg	SW-846 / 8240
Carbon Disulfide	<500.0	ug/kg	SW-846 / 8240
Isobutanol	<2500.0	ug/kg	SW-846 / 8240



RCP, INC.

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EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO.	93-0213
DATE RECEIVED	08-06-1993
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CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Distilled Water Rinse

ANALYSIS	RESULTS	UNITS	METHOD
F001			
Tetrachloroethylene	< 1.0	ug/kg	SW-846 / 8240
Trichloroethylene	< 1.0	ug/kg	SW-846 / 8240
Methylene Chloride	< 2.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 1.0	ug/kg	SW-846 / 8240
Carbon Tetrachloride	< 1.0	ug/kg	SW-846 / 8240
Chlorinated Fluorocarbons	< 3.0	ug/kg	SW-846 / 8240
F002			
Tetrachloroethylene	< 1.0	ug/kg	SW-846 / 8240
Methylene Chloride	< 2.0	ug/kg	SW-846 / 8240
Trichloroethylene	< 1.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 1.0	ug/kg	SW-846 / 8240
Chlorobenzene	< 1.0	ug/kg	SW-846 / 8240
1,1,2-Trichloro-			
1,2,2-Trifluoroethane	< 1.0	ug/kg	SW-846 / 8240
1,2-Dichlorobenzene	< 1.0	ug/kg	SW-846 / 8240
Trichlorofluoromethane	< 2.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	< 1.0	ug/kg	SW-846 / 8240
F003			
Xylene	< 1.0	ug/kg	SW-846 / 8240
Acetone	< 10.0	ug/kg	SW-846 / 8240
Ethyl Acetate	< 1.0	ug/kg	SW-846 / 8240
Ethyl Benzene	< 1.0	ug/kg	SW-846 / 8240
Ethyl Ether	< 1.0	ug/kg	SW-846 / 8240
Methyl Isobutyl-			
Ketone	< 5.0	ug/kg	SW-846 / 8240
n-Butyl Alcohol	< 25.0	ug/kg	SW-846 / 8240
Cyclohexanone	< 25.0	ug/kg	SW-846 / 8270
Methanol	N.D.	ug/kg	SW-846 / 8240
F004			
Cresols	N.R.	ug/kg	SW-846 / 8270
Cresylic Acid	N.R.	ug/kg	SW-846 / 8270
Nitrobenzene	N.R.	ug/kg	SW-846 / 8270
F005			
Toluene	< 1.0	ug/kg	SW-846 / 8240
Ethyl Ethyl Ketone	< 2.0	ug/kg	SW-846 / 8240
Carbon Disulfide	< 2.0	ug/kg	SW-846 / 8240
Isobutanol	< 25.0	ug/kg	SW-846 / 8240



RCP, INC.

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EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO.	93-0213
DATE RECEIVED	08-06-1993
DATE OF REPORT	08-16-1993
PAGE	2

CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Distilled Water Rinse

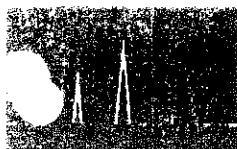
ANALYSIS	RESULTS	UNITS	METHOD
Pyridine	< 50.0	ug/kg	SW-846 / 8240
Benzene	< 1.0	ug/kg	SW-846 / 8240
2-Ethoxyethanol	< 10.0	ug/kg	SW-846 / 8240
2-Nitropropane	< 2.0	ug/kg	SW-846 / 8240
N.D. = Not Detected			
N.R. = Not Run			

DP# _____

Respectfully

Alex Alexopoulos

Laboratory Manager



ADVANCED ANALYTICS LABORATORIES

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing • Quality Control Programs • Research & Development

April 23, 1993

Encore Environmental
344 West Handerson Road
Columbus, Ohio 43214
ATTN: Brad Schneider

ANALYTICAL REPORT

PROJECT NO: 5406-00
SAMPLE NO'S: 78575 - 78577
EPA APPROVAL NO.: 4043
CLIENT PROJECT:

DATE RECEIVED: 04/13/93
DATE ANALYZED: 04/15/93
DATE REPORTED: 04/16/93

TEST RESULTS

AAL Sample ID: 78575/78576/78577 Composite
Client ID: #1/#2/#3 Composite

TCLP metals

Arsenic(mg/l)	< 0.020
Barium(mg/l)	0.610
Cadmium(mg/l)	< 0.020 tr
Chromium(mg/l)	< 0.050 tr
Lead(mg/l)	< 0.100
Mercury(mg/l)	< 0.002
Selenium(mg/l)	< 0.020
Silver(mg/l)	0.017

tr = trace

Methodology: TCLP metals in extract by SW-846 Method 1311. SW-846
Methods: Arsenic by 7061 analysis. Barium by 3010 digestion and
7080 analysis. Cadmium by 3010 digestion and 7130 analysis.
Chromium by 3010 digestion, 7190 analysis. Lead by 3010
digestion and 7420 analysis. Mercury by 7470 analysis. Selenium
by 7741 analysis. Silver by 7760 analysis.

Respectfully submitted,

L. Eve Karnitis, Chemist

Gas Chromatography - Infrared Spectroscopy - Ultraviolet-Visible Spectrophotometry - Atomic Absorption Spectrophotometry



ADVANCED ANALYTICS LABORATORIES

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing - Quality Control Programs - Research & Development

April 23, 1993

Encore Environmental
344 West Henderson Road
Columbus, Ohio 43214
ATTN: Brad Schneider

ANALYTICAL REPORT

PROJECT NO: 5406-00
SAMPLE NO'S: 78575 - 78577
EPA APPROVAL NO.: 4043
CLIENT PROJECT:

DATE RECEIVED: 04/13/93
DATE ANALYZED: 04/22/93
DATE REPORTED: 04/23/93

TEST RESULTS

AAL Sample ID: 78575/78576/78577 Composite
Client ID: #1/#2/#3 Composite

Component

TCLP Toluene(mg/l) 0.002

Methodology: TCLP Toluene by SW-846 Method 8020.

Respectfully submitted,

L. Eve Karnitis, Chemist

ADVANCED ANALYTICS LABORATORIES

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-8922 FAX (614) 299-4002

Analysis & Testing - Quality Control Programs - Research & Development

April 23, 1993

Encore Environmental
344 West Henderson Road
Columbus, Ohio 43214
ATTN: Brad Schneider

ANALYTICAL REPORT

PROJECT NO: 5406-00

SAMPLE NO'S: 78575 - 78577

EPA APPROVAL NO.: 4043

CLIENT PROJECT:

DATE RECEIVED: 04/13/93

DATE ANALYZED: 04/21/93

DATE REPORTED: 04/23/93

TEST RESULTS

BAL Sample ID: 78575/78576/78577 Composite

Client ID: #1/#2/#3 Composite

GC/MS Semivolatile Fraction

GC/MS analysis of sample #1/#2/#3 Composite shows the presence of Benzenedicarboxylic acid derivatives indicative of plastics material. Bis (2-ethylhexyl) phthalate is also present.

Methodology: GC/MS Semivolatile Fraction by SW-846 Method 8270.

Respectfully submitted,


L. Eve Karnitis, Chemist

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-1-T
DATE TAKEN: 11/06/95 1000
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31228-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	12.53	mg/kg	EL	11/08/95	7190
Lead	17.78	mg/kg	EL	11/08/95	7420
Toluene	< 5	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 98%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-1-B
DATE TAKEN: 11/06/95 1000
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31232-999

<u>TEST</u>	<u>RESULT</u>	<u>UNITS</u>	<u>ANALYST</u>	<u>DATE</u>	<u>METHOD</u>
Chromium	15.05	mg/kg	EL	11/08/95	7190
Lead	12.04	mg/kg	EL	11/08/95	7420
Toluene	16	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 101%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-2-T
DATE TAKEN: 11/06/95 1030
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31229-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	17.8	mg/kg	EL	11/08/95	7190
Lead	64.0	mg/kg	EL	11/08/95	7420
Toluene	351	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 100%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-2-B
DATE TAKEN: 11/06/95 1030
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31233-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	15.07	mg/kg	EL	11/08/95	7190
QC Duplicate	16.20				
Lead	20.89	mg/kg	EL	11/08/95	7420
QC Duplicate	29.59				
Toluene	58	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 101%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-3-T
DATE TAKEN: 11/06/95 1100
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31230-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	14.29	mg/kg	EL	11/08/95	7190
Lead	15.66	mg/kg	EL	11/08/95	7420
Toluene	68,300	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 99%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-3-B
DATE TAKEN: 11/06/95 1100
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31234-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	13.52	mg/kg	EL	11/08/95	7190
Lead	8.55	mg/kg	EL	11/08/95	7420
Toluene	78,800	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 88%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-4-T
DATE TAKEN: 11/06/95 1130
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31231-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	7.98	mg/kg	EL	11/08/95	7190
Lead	22.75	mg/kg	EL	11/08/95	7420
Toluene	142	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 96%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-4-B
DATE TAKEN: 11/06/95 1130
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31235-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	8.61	mg/kg	EL	11/08/95	7190
Lead	7.95	mg/kg	EL	11/08/95	7420
Toluene	1,600	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 95%.

L

Lockwood Laboratories

A Springfield Environmental Inc. Company

CHAIN OF
CUSTODY

1001 East St. P.O. Box 2728 Springfield, OH 45501-2728 Tel: (513) 324-8001 FAX: (513) 324-5185

CLIENT DESIGN ORIGINALS 402 JACKSON ST JACKSON CTR, OHIO 45334		PROJECT NAME CLONE REPORT PLAN		SDWA	
CONTACT Frank Pusey		SAMPLE LOCATION WEST SIDE OF BUILDING		NPDES	
TELEPHONE 513-596-5121		COLLECTED BY: JIM PARNISHA		RCRA	
PO NUMBER -0813		ANALYSIS REQUESTED		OTHER	
				QUOTE	
				LAB USE ONLY LOG #	
SAMPLE ID #	METHOD GR	SAMPLE TYPE	DATE	TIME	# OF BOTTLES
SB-1-T	✓	SOLID	11/6/95	10:00	1
SB-2-T	✓	"	"	10:30	1
SB-3-T	✓	"	"	11:00	1
SB-4-T	✓	"	"	11:30	1
SB-1-B	✓	"	"	10:00	1
SB-2-B	✓	"	"	10:30	1
SB-3-B	✓	"	"	11:00	1
SB-4-B	✓	"	"	11:30	1

COMMENTS: GIVE RESULTS TO JIM PARNISHA

SAMPLE RELINQUISHED BY: Frank Pusey	DATE/TIME 11/6/95	SAMPLES RECEIVED BY: Jim Parnish	DATE/TIME 11/6/95 12:13	REQUESTED DUE DATE
SAMPLE RELINQUISHED BY:	DATE/TIME	SAMPLES RECEIVED BY:	DATE/TIME	RUSH: YES NO

SAMPLES RECEIVED IN LAB BY: Jackie Schmidt TIME 1500 DATE 11/6/95

TERMS & CONDITIONS

- Minimum invoice amount is \$25.00
- Payment terms are NET 30 Days with approved credit. A 2% discount is available for payments within 10 Days. Past due invoices are subject to a finance charge.
- Submission of Chain of Custody and samples constitutes an agreement to perform the analysis and the client agrees to pay for any analyses completed prior to a notification "not to proceed".
- Samples found to be "hazardous" will be returned to the client for disposal. Radioactive samples will not be accepted.
- Complex samples may incur an additional prep charge. Client will be notified before lab proceeds.
- The fee structure reflects our normal QC/QA protocol. Additional QC/QA will require a surcharge.
- TURNAROUND TIME (TAT) is usually one week or less. Every effort will be made to accommodate RUSH samples. Additional charges, up to 100%, may be added depending on the time requirements. ADVANCE NOTIFICATION OF RUSH SAMPLES IS APPRECIATED!
- Confidentiality of all data and customer information is strictly adhered to by Lockwood Laboratories and Springfield Environmental.
- Samples will be analyzed in accordance with approved & standard test procedures to the best of our ability. Lockwood Laboratories, however, cannot be held responsible for the representativeness of the sample.
- In no event shall Lockwood Laboratories be held liable for the consequences of the data reported and its use, and shall be liable only for the monetary value of the tests.

BACKGROUND HEAVY METAL CONC. IN OHIO SOILS

<u>METAL</u>	<u>NO.</u>	<u>MEAN</u>	<u>STD. DEV.</u>
		----- mg/kg -----	
PB	239	19	5
ZN	239	75	15
CU	239	19	5
NI	239	18	5
CD	237	0.2	0.3

(Logan, Miller, 1983)

INTER OFFICE COMMUNICATION

TO: Tom Crepeau, Section Manager, Data Management Section, CO

FROM: ^{CB}Chris Budich through ^{W/O}Harold O'Connell, Group Leader,
DHWM, SWDO

RE: Design Original, Inc., Certification
OHD 063 989 545

DATE: July 25, 1996

On July 3, 1996, Design Original, Inc. located in Jackson Center, Ohio submitted a closure certification document for an unpermitted hazardous waste disposal area.

This certification was reviewed on July 16, 1996. The certification inspection was conducted on July 17, 1996. Upon review of the Certification report, two deviations from the approved Closure Plan were noted. One roll-off of F006 contaminated soil was disposed of at a licensed solid waste landfill. Upon discovering this error, Ohio EPA contacted both the facility and the landfill. The landfill has filed an unmanifested waste report to the DSIWM\SWDO and a copy has been included in the Design Original DHWM file. The facility had run a TCLP on the material and it appeared to the landfill that the material had been properly characterized and could be accepted. Ohio EPA requested that the facility conduct an analysis for total organics (toluene was main COC) on the material. Results of this analysis indicated very low levels of toluene (ppb range). DHWM\SWDO feels that these low levels do not pose a threat as the the material was disposed at a BAT landfill.

The second deviation was that the lead clean-up level in the approved closure plan was based on Ohio Farm Soils (29.0 ppm). The lead level achieved through closure activities was 42.72 ppm (95% UCL). Again, DHWM\SWDO does not believe this level poses a threat. This level is within the range of background levels reported in the study by Cox-Colvin & Associates and the material passed the TCLP for lead. Given the circumstances surrounding this closure and the degree of effort put forth by the facility, DHWM\SWDO feels that the closure performance standards have been met.

Based on the review of the certification document and the inspection, I conclude that Design Original, Inc. has met the closure standards proposed in their closure plan approved May 10, 1996.

Environmental measures achieved through this closure was the removal of 100 cubic yards of contaminated soil which was disposed of off-site. If you have any questions concerning the above, please contact me at (513) 285-6083.

cc: Montee Sulieman, Closure Unit, DHWM, CO

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NOV 08 2001

ILINMI PERMIT SECTION - WMB
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

NOV 08 2001

SPRINGFIELD ENVIRONMENTAL

FINAL CLOSURE CERTIFICATION REPORT

DESIGN ORIGINAL, INCORPORATED
402 JACKSON STREET
JACKSON CENTER, OHIO 45334-0183

PREPARED FOR: FRANK PUSEY, PRESIDENT

PREPARED BY: JAMES E. PARRISH
LOCKWOOD LABORATORIES / SPRINGFIELD ENVIRONMENTAL, INC.
PO BOX 2728
SPRINGFIELD, OHIO 45501-2728
513 / 324-8001

JUNE 25, 1996

RECEIVED
OHIO EPA

JUL 03 1996

DIV. OF HAZARDOUS WASTE MGT.

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3.0 SCOPE OF WORK

3.1 EXCAVATION OF CONTAMINATED ZONE

Excavation of the contaminated soil was accomplished on April 26, 1996. Approximately 100 cubic yards (126 tons) of soil were excavated. The site plan (Figure 3.1) shows the area excavated. The area was divided into nine equal areas and labeled 1A, 2A, 3A, 1B, 2B, 3B, 1C, 2C and 3C as shown. The entire area was initially excavated to a depth of two feet and the soil was placed in lined roll-off containers. Excavation was followed by VOC measurements using the HNu PID Meter calibrated to Toluene. Those results are shown in Table 3.1. Five of the nine readings, 1A, 2A, 3A, 3B and 3C, were below the remediation target of <1.0. No further excavation was made in those areas.

Two additional feet of soil were then excavated from areas 1B, 2B, 1C and 2C. The PID meter readings continued to show high readings as shown in Table 3.1 at the 4 foot depth. Two more feet were excavated from those same areas and another round of PID meter readings taken. Those results were also high; as shown in Table 3.1 at the 6 foot level. Two to three additional feet were excavated for a total of eight to nine feet and another round of PID tests conducted. Those results are shown as the 8 foot depth readings and were all less than 1.0.

During excavation, an abandoned 6 inch PVC sanitary sewer line was encountered and the line broken. After excavation was completed, the line was replaced and the area backfilled. No wastewater discharge from the line entered the excavation.

Note that the excavation at the building edge was tailored to angle off at 45° from the bottom of the slab so as not to compromise the structural integrity of the building.

Photographs of the remediation activities were taken and are presented in Appendix "G".

3.2 TRANSPORTATION AND DISPOSAL OF CONTAMINATED SOIL

The removed soil was stored in six roll-off units. Three roll-offs were of the 30 cubic yard size and three were 20 cubic yard. Each roll-off was sampled (composite sampling procedure wherein a sample was taken from each corner plus the center of each unit). The samples were analyzed using TCLP Test procedures. Table 3.2 lists the results of the TCLP analysis.

Based on the TCLP test results, the roll-off units were released to the Cherokee Run Landfill near Bellefontaine, Ohio. Two of the roll-offs were transported to Cherokee Run on Friday, May 10, 1996 and two more on Saturday, May 11 (roll-offs #2,4,5 and 6). The remaining two roll-offs were not transported that day because of extremely wet and muddy ground.

TABLE 3.1 DESIGN ORIGINAL HnU SAMPLE RESULTS
APRIL 26, 1996

SAMPLE POINT	DEPTH	TIME	READING
1A	2	11:40AM	<1
1B	2	11:36	310
2A	2	11:42	<1
2B	2	11:37	50
3A	2	11:40	<1
3B	2	11:38	<1
3C	2	11:39	<1
1C	2	12:30	350
2C	2	12:32	60
1B	4	1:40	90
2B	4	1:42	200
1C	4	1:45	250
2C	4	1:50	70
1B	6	4:08	30
2B	6	4:10	210
1C	6	5:24	32
2C	6	5:28	4.6
1B	8	7:10	<1.0
2B	8	7:12	<1.0
1C	8	7:15	<1.0
2C	8	7:18	<1.0
HNu Model HW-101 with 10.2 EV Lamp Serial # 6854			
Calibrated to Toluene Standard			
All readings in parts per million toluene			

PHOTOIONIZATION READINGS

TABL 3.2

ROLLOFF #	1	2	3	4	5	6
LEAD	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
CHROMIUM	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
BENZENE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
CCL4	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
CHLOROBENZENE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
CHLOROFORM	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
1,4-DICHLOROBENZENE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
1,2-DICHLOROETHANE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
1,1-DICHLOROETHYLENE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
METHYL ETHYL KETONE	<0.500	<0.500	<0.500	<0.500	<0.500	<0.500
TETRACHLOROETHYLENE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
TRICHLOROETHYLENE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
VINYL CHLORIDE	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100
FLASH POINT	>200 F	>200 F	>200 F	>200 F	>200 F	>200 F

DESIGN ORIGINAL ROLLOFF TCLP ANALYSIS

On Monday, May 13, Mr. Chris Budich of the Southwest District Office of the Ohio EPA advised that TCLP testing was insufficient and that "total constituent" testing would be required to determine disposition. We advised Mr. Budich that four of the six had already been transported and disposed at the Cherokee Run Landfill. Roll-offs # 1 and # 3, however, remained at the excavation site.

An immediate "hold order" on the remaining two roll-offs was communicated to the Transporter, AWT Transfer Services of St. Paris Ohio. In addition, Cherokee Run Landfill was advised of the change in plans. Testing for "Total Volatiles" began at Lockwood Laboratories on May 13.

The results of the "totals" testing indicated that roll-offs numbered 1 through 5 were non-hazardous waste while the # 6 roll-off had 300 micrograms per kilogram (parts per billion) of Toluene.

Chris Budich (OEPA) was advised on May 15 that roll-off # 6 tested positive for toluene, but that it was one of the roll-offs that had already been landfilled at Cherokee Run. He asked that the complete scenario be included in this Closure Certification Report. He also advised that the remaining two roll-offs, # 1 and # 3, showing no contamination, could be landfilled. They were landfilled at the Stony Hollow Recycling and Landfill Facility in Dayton on May 31, 1996.

Copies of telephone logs of conversations with Mr. Budich are presented in Appendix "F".

3.3 ON-SITE TESTING

HNu Photoionization meter readings were taken in the approximate center of each sector as excavation progressed through each two foot increment. Those results are shown in Table 3.1.

After removal of the contaminated soil, the floor of the cavity was sampled at six locations. The samples were iced down in coolers for transportation back to Lockwood Laboratories. Subsequent testing for Total Toxic Organics via EPA testing protocol SW 846 method 8240 for volatiles, 7420 for lead and 7190 for chromium was conducted.

Those results may be found in Appendix "E". They indicate that all of the contamination was removed and the closure was complete.

3.4 DECONTAMINATION

Decontamination was accomplished by hosing down the backhoe bucket and tires with a high pressure nozzle and collecting the residual water in a plastic "visqueen moat". The water was pumped from the visqueen into a 55 gallon drum and removed by SEI personnel. The visqueen used for the moat was deposited with the removed soil and landfilled. Care was taken to prevent transfer of any contaminated soil from the site via

any of the equipment used. This included any debris such as personal protective clothing and gloves. These were deposited in the roll-offs and disposed with the contaminated soil.

The decontamination wastewater was returned to SEI where it was combined with similar liquid wastes. These will be tested for hazardous characteristics and subsequently disposed as required by law.

3.5 EQUIPMENT

Equipment on site included a backhoe, six roll-off containers (three 20 cubic yard and three 30 cubic yard), an HNu Photoionization test meter, a stainless steel trowel, a deionized water bottle, and dedicated plastic spoons for each soil sample, a quantity of plastic visqueen, a hose with a high pressure nozzle for decontamination, a portable sump pump, tygon tubing and a drum for collecting the decontamination water.

4.0 PROJECT MANAGERS LOG

4.1 TIME TABLE

The actual excavation was accomplished in one day on April 26, 1996. The day began at 7:00 AM with the spotting of two 20 cubic yard roll-offs. Excavation began soon thereafter. It became almost immediately apparent that two additional roll-offs were required. Those were ordered and delivered shortly before noon. In the meantime, the HNu PID meter readings at the two foot level were made and recorded. Those results are available in Table 3.1. Excavation of the remaining four "hot" sectors began as soon as the third and fourth roll-offs were available. When it became apparent that the excavation would need to go below the four foot level, the final two roll-offs were ordered with # 5 arriving around 4:30 PM and # 6 near 6:30 PM. Excavation continued to the 8 or 9 foot level before the PID readings were below 1.0. The post closure sampling was conducted and the decontamination of equipment was accomplished by 8:00 PM. The site was subsequently secured by 8:30 PM.

After the initial TCLP testing on the roll-offs was completed on May 3, 1996 and the Cherokee Run Landfill had accepted the waste on May 9, 1996, the transfer agent (AWT) was released to move the roll-offs to the landfill. Transfer of the first two units took place on Friday afternoon, May 10 with the next two on Saturday, May 11. Movement of the last two was postponed until the field opposite them could dry out. It was feared that the trucks would become bogged down in the mud. Backfill of the excavation with clean gravel took place on Saturday April 27, 1996.

Chris Budich (OEPA) was provided with a verbal status report on May 13.

4.2 ENGINEERING RESPONSIBILITY

Engineering decisions at the site were the responsibility of the Project Manager, James E. Parrish, of Lockwood Laboratories / Springfield Environmental, Inc.

Mr. Henry R. Stonerook, P. E., was present at the site to observe excavation and closure activities and to provide the required Professional Engineer certification. Mr. Stonerook certifies the excavation and closure activities but was not involved with the disposition of the waste soil.

4.3 CERTIFICATION

The owner / operator, Frank E. Pusey; the Project Manager, James E. Parrish; and Henry R. Stonerook, Registered Professional Engineer have signed this Closure Certification.

This paragraph satisfies the requirements listed in The Ohio Administrative Code 3745-50-42.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Owner/Operator:

Frank E. Puscy
Frank E. Puscy

Project Manager:

James E. Parrish
James E. Parrish

Registered Professional Engineer:

Henry R. Stonerook
Henry R. Stonerook, P.E.



APPENDIX "A" CLOSURE PLAN

CLOSURE PLAN

for

**DESIGN ORIGINAL, INCORPORATED
402 JACKSON STREET
JACKSON CENTER, OHIO**

**PREPARED BY: JAMES E. PARRISH
LOCKWOOD LABORATORIES / SPRINGFIELD ENVIRONMENTAL, INC.
PO BOX 2728
SPRINGFIELD, OHIO 45501-2728
513 / 324-8001**

NOVEMBER 30, 1995

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- 2.0 SITE SAFETY AND SECURITY
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1.0 INTRODUCTION

1.1 HISTORY AND BACKGROUND

This plan is in response to a "Notice of Deficiency" (NOD) dated November 25, 1994 from Donald R. Schregardus, Director of the Ohio Environmental Protection Agency (OEPA). In addition, a previous Closure Plan dated September 15, 1993 (and amended Jan. 4, 1994) was never corrected to satisfy the NOD. This plan corrects the previous deficiencies and responds to an "Enforcement Action" by the Ohio EPA on the owner of this company at 402 Jackson Street in Jackson Center, Ohio.

It should be noted that this is a new Closure Plan and not a modification to the one submitted by Regency Environmental, Inc.

The deficiencies noted in the OEPA Notice of Deficiency are addressed as follows:

- | | |
|----|-----------------|
| #1 | See Section 4.4 |
| #2 | See Section 1.3 |
| #3 | See Section 1.4 |
| #4 | See Section 3.4 |
| #5 | See Section 1.4 |

Design Original is a manufacturer of stitched embroidery and printed wearing apparel. The processes involved are stitching and silk screening. The silk screening process utilizes solvent based inks. Cleanup of the screens involves the use of toluene. The Generator Identification Code for this company is OHD063989545.

The manufacturing operations are housed in a one story building built on a concrete slab.

The Waste Management Unit (WMU) is an area outside the west side of the building and adjacent to the building where silk screens were cleaned with toluene. Subsequent testing of the soil in this area has shown that an area approximately 35 by 16 feet is contaminated with toluene (F005) to a depth of about 4 feet. In addition, a few "hot spots" exist near the surface where lead and chromium readings are above background levels and certain other ink solvents have been detected.

The WMU is characterized by a layer of crushed stone approximately 2-3 inches deep and a subsoil consisting mainly of clay.

1.2 PLAN OBJECTIVES

This plan will satisfy the closure requirements stated in the Ohio Environmental Protection Agency Code 3745-66.

Lockwood Laboratories / Springfield Environmental, Inc. (LL/SEI) will attempt to accomplish the following remediation objectives:

- a) Remove approximately 60 cubic yards of contaminated soil.
- b) Sample, test and characterize the waste profile of the removed soil.
- c) Transfer the removed soil to a licensed disposal site.
- d) Develop and obtain all necessary permits.
- e) Determine the extent of soil removal necessary by use of HNu Photoionization Detection (PID) test unit on site.
- f) Backfill with clean fill material.
- g) Develop and implement the site safety and security plans.
- h) Prepare the final closure report.

1.3 SITE PLAN

See Figure 1.3 attached. The site is located at 402 Jackson Street in Jackson Center, Ohio. The cleanup will encompass an area approximately 35 by 16 feet including points 4 and 8 which were mentioned in item #2 of the "Specific Comments" in the Notice of Deficiency.

1.4 CLEANUP TARGET LEVELS

The target levels for cleanup of this WMU are as follows:

Toluene	Non Detectable
Lead	29.0 ppm (Ohio Farm Soils)
Chromium	20.0 ppm " " "
Methylene Chloride*	Non Detectable
Chlorobenzene*	"
Xylene*	"
Acetone*	"
Methyl Isobutyl Ketone*	"
Methyl Ethyl Ketone*	"
Benzene*	"
Ethyl Benzene*	"

*These solvents were detected in tests conducted in 1993.

The levels of Lead and Chromium selected for cleanup targets are those found as "Background Levels of Heavy Metals in Ohio Farm Soils", 1983, Research Circular #275, Ohio State University, Wooster, Ohio. This satisfies "Specific Comment #3", in the Notice of Deficiency. It also satisfies the requirements listed in OAC 3745-66-12 (B) (4).

The above also addresses "Specific Comment #5" in the Notice of Deficiency by targeting cleanup levels for the solvents found in the 1993 testing (OAC 3745-66-12(B) (2)).

2.0 SITE SAFETY AND SECURITY PLAN

2.1 SITE SAFETY PLAN

A) GENERAL INFORMATION

SITE: Design Original, Incorporated

ADDRESS: 402 Jackson Street
Jackson Center, Ohio 45334-0813

PREPARED BY: James E. Parrish, Environmental Engineer
Lockwood Laboratories / Springfield Environmental, Inc.
P. O. Box 2728
1001 East Street
Springfield, Ohio 45501-2728

OVERALL HAZARD: SERIOUS _____ MODERATE _____
LOW XXX UNKNOWN _____

SITE DESCRIPTION: Relatively level terrain with no overhead obstruction.

B) SITE WASTE CHARACTERISTICS

WASTE TYPE: Solid (Soil contaminated with toluene).

C) HAZARD EVALUATION

Site hazards are very low. There are no underground or overhead electrical lines, no chemical hazards nor any mechanical hazards associated with this remediation plan. There may be a slight fire hazard associated with the remediation of solvent laden soil. However, the low concentration of solvents should not present an explosive or respiratory hazard.

D) SITE SAFETY WORK PLAN

PERIMETER ESTABLISHMENT

MAP/SITE PLAN ATTACHED:	YES
SITE SECURED:	YES, Site will be secured with yellow caution tape limiting access to remediation workers. No smoking or open flame will be permitted.
PERSONAL PROTECTION:	Level "D": Tyvek oversuit with gloves. No breathing protection will be required because of the low concentrations of contaminants.
MODIFICATIONS:	None required. Level "D" with gloves will suffice.
ACTIONS:	If organic vapor concentration at breathing zone rises to hazardous level, workers will be removed from the site and instructed to go to Level "C".
SPECIAL EQUIPMENT FACILITIES PROCEDURES:	None.
SITE ENTRY:	To be arranged with Project Manager.
WORK LIMITATIONS	Daylight Hours.
CLOSURE DERIVED WASTES:	All equipment will be hosed down at the site. All wastes and contaminated soils will remain at the work site until released for disposal. Personal protective clothing will be quarantined and remain with the soil until released for disposal.
EMERGENCY INFORMATION:	
PROJECT MANAGER:	James E. Parrish, Lockwood Labs (513)324-8001
FACILITY MANAGER:	Frank Pusey, Design Original, Inc. (513)596-5121
PROJECT TECHNICIAN:	Fred Fitzsimmons, Lockwood Labs (513)324-8001
FIRE:	Jackson Center Fire Department 911
POLICE:	Jackson Center PD 911 Shelby County Sheriff (513)498-1111
HOSPITAL:	Wilson Memorial (Sidney) (513)492-7296
OHIO EPA:	Chris Budich, SW District Office (513)285-6357

2.2 CONTINGENCY PLAN

The contingency plan is formulated in order to have pre-planned actions minimizing hazards in case of fire, explosion or any unplanned release of hazardous waste into the environment whether air, soil, surface water or aquifer. The contingencies are planned for all activities associated in executing the remediation objectives.

Implementation of the Contingency Plan

The Project Manager has full authority in case of an emergency during the execution of the Remediation Plan. The following potential situations may trigger implementation of the Contingency Plan:

Explosion

Although highly unlikely, an explosion could possibly occur. All personnel will be evacuated.

Fire

The probability that a fire could occur is low. If a fire does breakout, uncontaminated soil would be used to smother the fire.

Air Release

Air releases of a minor nature will occur during excavation. If the concentrations reach hazardous proportions, personnel will be removed from the area and outfitted with "C" level protection.

2.3 EMERGENCY MEASURES

The measures listed here will be followed for all non-acute emergencies:

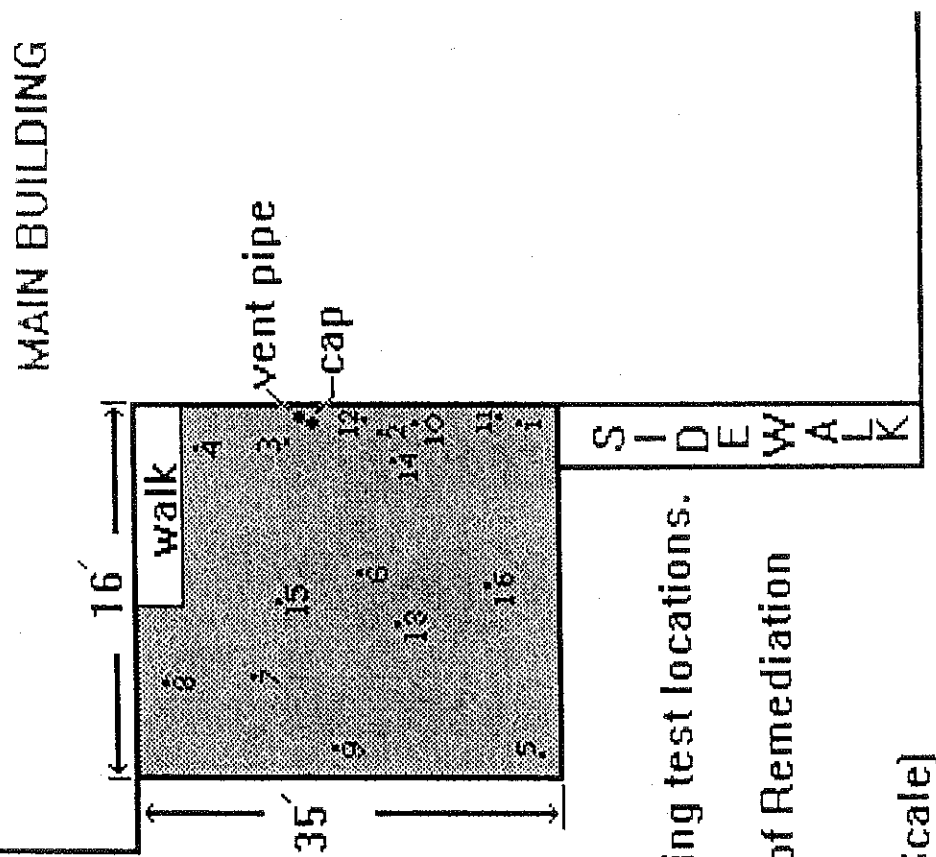
- 1) All employees discovering an emergency shall notify the Project Manager.
- 2) The Project Manager, in concert with the Facility Manager, will assess the severity of the emergency and contact the appropriate emergency personnel.
- 3) The Project Manager and the Facility Manager will take the necessary steps to contain the hazard and secure the site.
- 4) The project Manager will take all necessary steps to inform all emergency personnel of the hazardous nature of the site.

- 5) All non-essential personnel will be removed from the area until the emergency is under control. Project personnel will meet at the street near the railroad tracks, until the Project Manager determines it is safe to resume work.
- 6) The Project Manager will ensure all contaminated wastes from emergency personnel are collected and contained after the emergency is brought under control. (Tyvek suits, gloves absorbents etc.)
- 7) The Project Manager and the Facility Manager will ensure that all on-site equipment is restored to pre-emergency condition before remediation is continued.
- 8) The Project Manager and the Facility Manager will investigate the cause of the emergency and provide an irreversible solution to prevent a reoccurrence.

SITE SAFETY PLAN ACKNOWLEDGMENT FORM

<u>PRINT NAME</u>	<u>SIGNATURE</u>	<u>REPRESENTING</u>	<u>DATE</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
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_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

FIGURE 1.3



Numbers refer to soil boring test locations.

● Approximate Area of Remediation

[Not to Scale]

Table 3.1

SOIL BORING DATA PRIOR TO REMEDIATION

All data in parts per million (milligrams per Kilogram)

LOCATION	DEPTH	DATE	TOLUENE*	LEAD*	CHROMIUM*
1	0" TO 6"	10/25/90	ND	41	6
1	24" TO 36"	10/25/90	0.051	41	17
2	0" TO 6"	10/31/90	ND	25	15
2	24" TO 36"	10/25/90	78	14	16
3	0" TO 6"	10/25/90	10.3	13	12
3	24" TO 36"	10/25/90	3.2	27	17
4	0" TO 6"	10/25/90	0.007	13	16
4	24" TO 36"	10/25/90	0.008	25	15
5	0" TO 6"	10/25/90	ND	39	28
5	24" TO 36"	10/25/90	36	27	22
6	0" TO 6"	10/25/90	3.7	27	19
6	24" TO 36"	10/31/90	819	28	19
7	0" to 6"	10/25/90	2.5	13	18
7	24" to 36"	10/25/90	1.24	27	17
8	0" to 6"	10/25/90	0.01	26	18
8	24" to 36"	10/25/90	1.34	27	18
9	0" to 6"	10/31/90	0.08	29	19
9	24" to 36"	10/25/90	2.9	14	23
10	24" to 36"	10/25/90	1040	27	23
11	36"	8/16/93	0.104*		
12	36"	8/16/93	0.087*		
13	36"	8/16/93	18.100*		
14	0" to 24"	11/6/95	0.142	22.75	7.98
14	24" to 48"	11/6/95	1.600	7.95	8.61
15	0" to 24"	11/6/95	0.351	64.0	17.8
15	24" to 48"	11/6/95	0.058	20.89	15.07
16	0" to 24"	11/6/95	68.300	15.66	14.29
16	24" to 48"	11/6/95	78.800	8.55	13.52

* Also, evidence of methylene chloride, chlorobenzene, xylene, acetone, methyl isobutyl ketone, methyl ethyl ketone, benzene and ethylbenzene was seen in the 1993 samples.

ND = Non Detectable

Bold numbers represent levels above the cleanup target levels.

3.0 SCOPE OF WORK

3.1 EXCAVATION OF CONTAMINATED ZONE

The site plan, shown as Figure 1.3, shows the area to be excavated as the shaded area of the plan. Soil depth removed will be approximately 48". However, soil depth removed will be determined in the field using an HNu Photoionization Detection (PID) instrument calibrated to toluene. A target concentration of <1.0 parts per million (1.0 mg/Kg) as measured by the PID will be adopted.

The excavation at the building edge will be tailored to angle off at 45° from the bottom of the slab so as not to compromise the structural integrity of the building.

3.2 TREATMENT AND DISPOSAL OF CONTAMINATED SOIL

The contaminated soil will eventually be transported to a certified landfill for disposal. The removed soil will be sampled and tested in the lab for hazardous characteristics. If the test results are below standards, the soil will be landfilled. If not, the soil will be stored on an impervious surface until other arrangements can be made. The other arrangements may include thermal desorption, incineration or bioremediation. If the soil must be disposed as hazardous waste, delisting options will be explored.

3.3 ON-SITE TESTING

After removal of the contaminated soil, the floor of the cavity will be sampled at six locations. The samples will be iced down in coolers for transportation back to Lockwood Laboratories and subsequent testing for toluene via EPA testing protocol SW 846 method 8020.

3.4 DECONTAMINATION

Decontamination will be accomplished by hosing down the backhoe bucket and tires with a high pressure nozzle and collecting the residual water in a plastic "visqueen moat". The water will be pumped into a drum and subsequently tested for hazardous characteristics. The test results will dictate the disposal procedure for the water. If hazardous, the water will be transported and disposed as hazardous waste at a certified disposal facility. The visqueen used for the moat will be kept with the removed soil until final disposition. Care will be taken to prevent transfer of any contaminated soil from the site on any of the equipment used. This would include any debris such as personal protective clothing and gloves. These will be deposited and disposed with the contaminated soil.

The above satisfies "Specific Comment #4" in the Notice of Deficiency.

3.5 EQUIPMENT

Equipment on site will include a backhoe, approximately 5, 20 cubic yard rolloff containers, an HNu Photoionization testing meter, appropriate sampling equipment, a quantity of plastic visqueen, a hose with a high pressure nozzle for decontamination and a drum for collecting the decontamination water.

4.0 PROJECT MANAGEMENT

4.1 TIME TABLE

The actual excavation can be accomplished in one day. The sub contracting, leasing and scheduling of the backhoe and rolloffs will take approximately two weeks once the project is approved by all parties. Testing of the post removal samples will consume an additional week and final disposition should be decided within two weeks of the excavation. Acceptance of the waste at the landfill will be determined by the "Hazardous Waste Profile" of the contaminated soil.

4.2 ENGINEERING RESPONSIBILITY

Engineering decisions at the site will be the responsibilities of the Project Manager. Within sixty days of final disposal of the removed soil and subsequent closure with clean backfill, the project Manager will prepare a Certification of Final Closure for submission to the Director of the Ohio EPA by registered mail. The certificate will state that the hazardous waste management unit was closed in accordance with the approved closure plan.

4.3 COST ESTIMATES

	\$
Preliminary Testing and Closure Plan Preparation	2200.00
Excavation Including Equipment Mobilization	1300.00
Roll-off Leasing Fees 6 units @ 200\$/week for 2 weeks	2400.00
Roll off Delivery and Transportation to Landfill 6 @ 425	2520.00
Hazardous Waste Laboratory Profile 6 @ \$850	5100.00
Project Manager/Engineer 10 hr. @ \$75	750.00
Project Technician 10 hr. @ \$35	350.00
Post Closure Certification Testing 3 @ \$650	1950.00
Disposal Fees (assuming disposal as F005) 60 yards @\$390 / yd	23,400.00
Totals	\$39,970.00

4.4 CERTIFICATION

Both the Owner and a Registered Professional Engineer will sign off on the following statement when the closure has been completed.

This paragraph satisfies the requirements listed in The Ohio Administrative Code 3745-50-42.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of

the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The above satisfies #1 of the "Specific Comments" noted in the Notice of Deficiency dated Nov. 25, 1994.

5.0 FINANCIAL ASSURANCE

Design Original, Inc. will provide financial assurance that the Closure Plan shall be executed through The "Financial Test" noted in 40 CFR Part 265 Subpart "H".

Table 1

Analytical Results
 Soil Sampling
 Design Original, Inc.
 Jackson Center, Ohio
 October 24, 25 & 31, 1990

Results Reported In Dry Weight (mg/kg)

Sample ID	Sample Depth (inches)	Total Chromium	Total Lead	Toluene
D-1	0-6"	6	41	BQL
D-1	24-36"	17	41	0.051
D-2(A)	0-6"	15	25	BQL
D-2	24-36"	16	14	78
D-3	0-6"	12	13	10.3
D-3	24-36"	17	27	3.2
D-4	0-6"	16	13	0.007
D-4	24-36"	15	25	0.008
D-5	0-6"	28	39	BQL
D-5	24-36"	22	27	36
D-6	0-6"	19	27	3.7
D-6(A)	24-36"	19	28	819
D-7	0-6"	18	13	2.5
D-7	24-36"	17	27	1.24
D-8	0-6"	18	26	0.010
D-8	24-36"	18	27	1.34
D-9(A)	0-6"	19	29	0.080
D-9	24-36"	23	14	2.9
D-10	24-36"	23	27	1040

Note:

BQL = Below Quantitation Limit

(A) = Replacement Samples taken 10/31/90

Sample D-10, 24"-36" is a duplicate sample of D-2, 24"-36"

Lab Analysis by Kemron Environmental Services

ANALYSIS	RESULTS	UNITS	METHOD
Ethylene	< 5.0	ug/kg	SW-846 / 8241
Ethylene	< 5.0	ug/kg	SW-846 / 8241
Chloride	74.2	ug/kg	SW-846 / 8241
Chloroethane	< 5.0	ug/kg	SW-846 / 8241
Chloride	< 5.0	ug/kg	SW-846 / 8241
Fluorocarbons	<10.0	ug/kg	SW-846 / 8241
Ethylene	< 5.0	ug/kg	SW-846 / 8241
Chloride	74.2	ug/kg	SW-846 / 8241
Ethylene	< 5.0	ug/kg	SW-846 / 8241
Chloroethane	< 5.0	ug/kg	SW-846 / 8241
Ethylene	11.6	ug/kg	SW-846 / 8241
Chloro-			
Chloroethane	<10.0	ug/kg	SW-846 / 8241
Chlorobenzene	< 5.0	ug/kg	SW-846 / 8241
Chloromethane	<10.0	ug/kg	SW-846 / 8241
Chloroethane	< 5.0	ug/kg	SW-846 / 8241
	5.5	ug/kg	SW-846 / 8241
	218.0	ug/kg	SW-846 / 8241
Ethylene	< 5.0	ug/kg	SW-846 / 8241
Ethylene	< 5.0	ug/kg	SW-846 / 8241
Ethylene	< 5.0	ug/kg	SW-846 / 8241
Ethyl-			
	16.1	ug/kg	SW-846 / 8241
Chloro-			
Chloroethane	<50.0	ug/kg	SW-846 / 8241
Ethylene	<50.0	ug/kg	SW-846 / 8270
Ethylene	<250.0	ug/kg	SW-846 / 8241
	< 333	ug/kg	SW-846 / 8270
Ethylene	< 333	ug/kg	SW-846 / 8270
Ethylene	< 333	ug/kg	SW-846 / 8270
	104.0	ug/kg	SW-846 / 8241
Ethylene	61.3	ug/kg	SW-846 / 8241
Ethylene	<10.0	ug/kg	SW-846 / 8241
Ethylene	<50.0	ug/kg	SW-846 / 8241

RCP, INC.

3246 S. Hamilton Rd. 5603-1214 Tanglewood Bay Dr.
 P.O. Box 32454 Orlando Florida 32821
 Columbus, Ohio 43232 (407) 238-1614
 (614) 864-6123

EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO. 97-11
 DATE RECEIVED 9-1-97
 DATE OF REPORT 9-8-97
 PAGE 2

CLIENT INFORMATION

Agency Enviro, Inc.
 P.O. Box 43221
 Columbus, OH 43221
 George Komarov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth
 Location #1; Contaminated

ANALYSIS	RESULTS	UNITS	METHOD
	<100.0	ug/kg	SW-846 / 814
	< 5.0	ug/kg	SW-846 / 814
	<20.0	ug/kg	SW-846 / 814
	<10.0	ug/kg	SW-846 / 814

Respectfully

Lee Hecox

Laboratory Manager



RCP, INC.

2246 S. Hamilton Rd. 6603-1214 Tanglewood Bay Dr.
P.O. Box 32454 Orlando, Florida 32821
Columbus, Ohio 43232 (407) 238-1614
(614) 864-6123
EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO.	93-0211
DATE RECEIVED	08-06-1993
DATE OF REPORT	08-13-1993
PAGE	1

CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth
Location #2; Collected: 7/20

ANALYSIS	RESULTS	UNITS	METHOD
001			
Tetrachloroethylene	< 5.0	ug/kg	SW-846 / 8240
Trichloroethylene	< 5.0	ug/kg	SW-846 / 8240
Ethylene Chloride	33.8	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
Carbon Tetrachloride	< 5.0	ug/kg	SW-846 / 8240
Chlorinated Fluorocarbons	<10.0	ug/kg	SW-846 / 8240
002			
Tetrachloroethylene	< 5.0	ug/kg	SW-846 / 8240
Ethylene Chloride	33.8	ug/kg	SW-846 / 8240
Trichloroethylene	< 5.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
Chlorobenzene	10.2	ug/kg	SW-846 / 8240
1,1,2-Trichloro-			
2,2,2-Trifluoroethane	< 5.0	ug/kg	SW-846 / 8240
1,2-Dichlorobenzene	< 5.0	ug/kg	SW-846 / 8240
Trichlorofluoromethane	<10.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	< 5.0	ug/kg	SW-846 / 8240
003			
Acetone	< 5.0	ug/kg	SW-846 / 8240
Ethyl Acetate	145.0	ug/kg	SW-846 / 8240
Ethyl Benzene	< 5.0	ug/kg	SW-846 / 8240
Ethyl Ether	< 5.0	ug/kg	SW-846 / 8240
Methyl Isobutyl-			
Ketone	< 5.0	ug/kg	SW-846 / 8240
n-Butyl Alcohol	<50.0	ug/kg	SW-846 / 8240
Cyclohexanone	<50.0	ug/kg	SW-846 / 8270
Methanol	<250.0	ug/kg	SW-846 / 8240
004			
Cresols	< 333	ug/kg	SW-846 / 8270
Cresylic Acid	< 333	ug/kg	SW-846 / 8270
Nitrobenzene	< 333	ug/kg	SW-846 / 8270
005			
Acetone	87.4	ug/kg	SW-846 / 8240
Methyl Ethyl Ketone	<10.0	ug/kg	SW-846 / 8240
Carbon Disulfide	<10.0	ug/kg	SW-846 / 8240
n-Butanol	<50.0	ug/kg	SW-846 / 8240



RCP, INC.

2246 S. Hamilton Rd. 6603-1214 Tanglewood Bay Dr.
P.O. Box 32454 Orlando, Florida 32821
Columbus, Ohio 43232 (407) 238-1614
(614) 864-6123
EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO. 93-0011
DATE RECEIVED 08-06-1993
DATE OF REPORT 08-13-1993
PAGE 2

CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth
Location #2; Collected: 7/93

ANALYSIS

RESULTS

UNITS

METHOD

Acridine	<100.0	ug/kg	SW-846 / 8240
Azene	5.0	ug/kg	SW-846 / 8240
Ethoxyethanol	<20.0	ug/kg	SW-846 / 8240
Nitropropane	<10.0	ug/kg	SW-846 / 8240

Respectfully

[Signature]

Laboratory Manager



RCP, INC.

2246 S. Hamilton Rd.
P.O. Box 32454
Columbus, Ohio 43232
(614) 864-6123

EPA Approval No. 4160

6603-1214 Tanglewood Bay Dr.
Orlando, Florida 32821
(407) 238-1614

LABORATORY RESULTS

SAMPLE NO.	93-0212
DATE RECEIVED	08-06-1993
DATE OF REPORT	08-13-1993
PAGE	1

CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth: Location
Collected: 7/28/93

ANALYSIS	RESULTS	UNITS	METHOD
F001			
Tetrachloroethylene	<250.0	ug/kg	SW-846 / 8240
Trichloroethylene	<250.0	ug/kg	SW-846 / 8240
Methylene Chloride	<500.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
Carbon Tetrachloride	<250.0	ug/kg	SW-846 / 8240
Chlorinated Fluorocarbons	<500.0	ug/kg	SW-846 / 8240
F002			
Tetrachloroethylene	<250.0	ug/kg	SW-846 / 8240
Methylene Chloride	<500.0	ug/kg	SW-846 / 8240
Trichloroethylene	<250.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
Chlorobenzene	<250.0	ug/kg	SW-846 / 8240
1,1,2-Trichloro-			
1,2,2-Trifluoroethane	<250.0	ug/kg	SW-846 / 8240
1,2-Dichlorobenzene	<250.0	ug/kg	SW-846 / 8240
Trichlorofluoromethane	<500.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
F003			
Xylene	<250.0	ug/kg	SW-846 / 8240
Acetone	<1000.0	ug/kg	SW-846 / 8240
Ethyl Acetate	<250.0	ug/kg	SW-846 / 8240
Ethyl Benzene	250.0	ug/kg	SW-846 / 8240
Ethyl Ether	<250.0	ug/kg	SW-846 / 8240
Methyl Isobutyl-			
Ketone	<250.0	ug/kg	SW-846 / 8240
n-Butyl Alcohol	<2500.0	ug/kg	SW-846 / 8240
Cyclohexanone	<2500.0	ug/kg	SW-846 / 8270
Methanol	<250.0	ug/kg	SW-846 / 8240
F004			
Cresols	< 333	ug/kg	SW-846 / 8270
Cresylic Acid	< 333	ug/kg	SW-846 / 8270
Nitrobenzene	< 333	ug/kg	SW-846 / 8270
F005			
Toluene	18,100	ug/kg	SW-846 / 8240
Methyl Ethyl Ketone	<500.0	ug/kg	SW-846 / 8240
Carbon Disulfide	<500.0	ug/kg	SW-846 / 8240
Isobutanol	<2500.0	ug/kg	SW-846 / 8240



RCP, INC.

2246 S. Hamilton Rd. 6603-1214 Tanglewood Bay Dr.
P.O. Box 32454 Orlando, Florida 32821
Columbus, Ohio 43232 (407) 238-1614
(614) 864-6123
EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO.	93-0012
DATE RECEIVED	08-06-1993
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CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth; Location #7
Collected: 7/28/93

ANALYSIS

RESULTS

UNITS

METHOD

Pyridine	<5000.0	ug/kg	SW-846 / 8240
Benzene	<250.0	ug/kg	SW-846 / 8240
2-Ethoxyethanol	<1000.0	ug/kg	SW-846 / 8240
2-Nitropropane	<500.0	ug/kg	SW-846 / 8240

DP# _____

Respectfully

Laboratory Manager

RCP, INC.



2246 S. Hamilton Rd. 6603-1214 Tanglewood Bay Dr.
 P.O. Box 32454 Orlando, Florida 32821
 Columbus, Ohio 43232 (407) 238-1614
 (614) 864-6123
 EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO. 93-0212
 DATE RECEIVED 08-06-1993
 DATE OF REPORT 08-13-1993
 PAGE 1

CLIENT INFORMATION

Regency Enviro, Inc.
 P. O. Box 43221
 Columbus, OH 43221
 George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Soil 36" Depth; Location
 Collected: 7/28/93

ANALYSIS	RESULTS	UNITS	METHOD
F001			
Tetrachloroethylene	<250.0	ug/kg	SW-846 / 8240
Trichloroethylene	<250.0	ug/kg	SW-846 / 8240
Methylene Chloride	<500.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
Carbon Tetrachloride	<250.0	ug/kg	SW-846 / 8240
Chlorinated Fluorocarbons	<500.0	ug/kg	SW-846 / 8240
F002			
Tetrachloroethylene	<250.0	ug/kg	SW-846 / 8240
Methylene Chloride	<500.0	ug/kg	SW-846 / 8240
Trichloroethylene	<250.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
Chlorobenzene	<250.0	ug/kg	SW-846 / 8240
1,1,2-Trichloro-			
1,2,2-Trifluoroethane	<250.0	ug/kg	SW-846 / 8240
1,2-Dichlorobenzene	<250.0	ug/kg	SW-846 / 8240
Trichlorofluoromethane	<500.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	<250.0	ug/kg	SW-846 / 8240
F003			
Xylene	<250.0	ug/kg	SW-846 / 8240
Acetone	<1000.0	ug/kg	SW-846 / 8240
Ethyl Acetate	<250.0	ug/kg	SW-846 / 8240
Ethyl Benzene	250.0	ug/kg	SW-846 / 8240
Ethyl Ether	<250.0	ug/kg	SW-846 / 8240
Methyl Isobutyl-			
Ketone	<250.0	ug/kg	SW-846 / 8240
n-Butyl Alcohol	<2500.0	ug/kg	SW-846 / 8240
Cyclohexanone	<2500.0	ug/kg	SW-846 / 8270
Methanol	<250.0	ug/kg	SW-846 / 8240
F004			
Cresols	< 333	ug/kg	SW-846 / 8270
Cresylic Acid	< 333	ug/kg	SW-846 / 8270
Nitrobenzene	< 333	ug/kg	SW-846 / 8270
F005			
Toluene	18,100	ug/kg	SW-846 / 8240
Methyl Ethyl Ketone	<500.0	ug/kg	SW-846 / 8240
Carbon Disulfide	<500.0	ug/kg	SW-846 / 8240
Isobutanol	<2500.0	ug/kg	SW-846 / 8240



RCP, INC.

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(614) 864-6123
EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO.	93-0213
DATE RECEIVED	08-06-1993
DATE OF REPORT	08-16-1993
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CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Distilled Water Rinse

ANALYSIS	RESULTS	UNITS	METHOD
F001			
Tetrachloroethylene	< 1.0	ug/kg	SW-846 / 8240
Trichloroethylene	< 1.0	ug/kg	SW-846 / 8240
Ethylene Chloride	< 2.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 1.0	ug/kg	SW-846 / 8240
Carbon Tetrachloride	< 1.0	ug/kg	SW-846 / 8240
Chlorinated Fluorocarbons	< 3.0	ug/kg	SW-846 / 8240
F002			
Tetrachloroethylene	< 1.0	ug/kg	SW-846 / 8240
Ethylene Chloride	< 2.0	ug/kg	SW-846 / 8240
Trichloroethylene	< 1.0	ug/kg	SW-846 / 8240
1,1,1-Trichloroethane	< 1.0	ug/kg	SW-846 / 8240
Chlorobenzene	< 1.0	ug/kg	SW-846 / 8240
1,1,2-Trichloro-			
1,2,2-Trifluoroethane	< 1.0	ug/kg	SW-846 / 8240
1,2-Dichlorobenzene	< 1.0	ug/kg	SW-846 / 8240
Trichlorofluoromethane	< 2.0	ug/kg	SW-846 / 8240
1,1,2-Trichloroethane	< 1.0	ug/kg	SW-846 / 8240
F003			
Xylene	< 1.0	ug/kg	SW-846 / 8240
Acetone	< 10.0	ug/kg	SW-846 / 8240
Ethyl Acetate	< 1.0	ug/kg	SW-846 / 8240
Ethyl Benzene	< 1.0	ug/kg	SW-846 / 8240
Ethyl Ether	< 1.0	ug/kg	SW-846 / 8240
Methyl Isobutyl-			
Ketone	< 5.0	ug/kg	SW-846 / 8240
n-Butyl Alcohol	< 25.0	ug/kg	SW-846 / 8240
Cyclohexanone	< 25.0	ug/kg	SW-846 / 8270
Methanol	N.D.	ug/kg	SW-846 / 8240
F004			
Cresols	N.R.	ug/kg	SW-846 / 8270
Cresylic Acid	N.R.	ug/kg	SW-846 / 8270
Nitrobenzene	N.R.	ug/kg	SW-846 / 8270
F005			
Toluene	< 1.0	ug/kg	SW-846 / 8240
Methyl Ethyl Ketone	< 2.0	ug/kg	SW-846 / 8240
Carbon Disulfide	< 2.0	ug/kg	SW-846 / 8240
Isobutanol	< 25.0	ug/kg	SW-846 / 8240



RCP, INC.

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(614) 864-6123
EPA Approval No. 4160

LABORATORY RESULTS

SAMPLE NO.	93-0213
DATE RECEIVED	08-06-1993
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CLIENT INFORMATION

Regency Enviro, Inc.
P. O. Box 43221
Columbus, OH 43221
George Momirov

COMPANY NO. 212

SAMPLE IDENTIFICATION/DESCRIPTION

Distilled Water Rinse

ANALYSIS

RESULTS

UNITS

METHOD

idine	< 50.0	ug/kg	SW-846 / 8240
azene	< 1.0	ug/kg	SW-846 / 8240
Ethoxyethanol	< 10.0	ug/kg	SW-846 / 8240
itropropane	< 2.0	ug/kg	SW-846 / 8240
D. = Not Detected			
R. = Not Run			

Respectfully

Alex Alexopoulos

Laboratory Manager



ADVANCED ANALYTICS LABORATORIES

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing • Quality Control Programs • Research & Development

April 23, 1993

Encore Environmental
344 West Henderson Road
Columbus, Ohio 43214
ATTN: Brad Schneider

ANALYTICAL REPORT

PROJECT NO: 5406-00
SAMPLE NO'S: 78575 - 78577
EPA APPROVAL NO.: 4043
CLIENT PROJECT:

DATE RECEIVED: 04/23/93
DATE ANALYZED: 04/23/93
DATE REPORTED: 04/26/93

TEST RESULTS

AAL Sample ID: 78575/78576/78577 Composite
Client ID: #1/#2/#3 Composite

TCLP metals

Arsenic(mg/l)	< 0.020
Barium(mg/l)	0.610
Cadmium(mg/l)	< 0.020 tr
Chromium(mg/l)	< 0.050 tr
Lead(mg/l)	< 0.100
Mercury(mg/l)	< 0.002
Selenium(mg/l)	< 0.020
Silver(mg/l)	0.017

tr = trace

Methodology: TCLP metals in extract by SW-846 Method 1311. SW-846 Methods: Arsenic by 7061 analysis. Barium by 3010 digestion and 7080 analysis. Cadmium by 3010 digestion and 7130 analysis. Chromium by 3010 digestion, 7190 analysis. Lead by 3010 digestion and 7420 analysis. Mercury by 7470 analysis. Selenium by 7741 analysis. Silver by 7760 analysis.

Respectfully submitted,

L. Eve Karnitis, Chemist



ADVANCED ANALYTICS LABORATORIES

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing - Quality Control Programs - Research & Development

April 23, 1993

Encore Environmental
344 West Henderson Road
Columbus, Ohio 43214
ATTN: Brad Schneider

ANALYTICAL REPORT

PROJECT NO: 5406-00
SAMPLE NO'S: 78575 - 78577
EPA APPROVAL NO.: 4043
CLIENT PROJECT:

DATE RECEIVED: 04/22/93
DATE ANALYZED: 04/23/93
DATE REPORTED: 04/23/93

TEST RESULTS

AAL Sample ID: 78575/78576/78577 Composite
Client ID: #1/#2/#3 Composite

Component

TCLP Toluene(mg/l) 0.002

Methodology: TCLP Toluene by SW-846 Method 8020.

Respectfully submitted,

L. Eve Karnitis, Chemist



ADVANCED ANALYTICS LABORATORIES

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing - Quality Control Programs - Research & Development

April 23, 1993

Encore Environmental
344 West Henderson Road
Columbus, Ohio 43214
ATTN: Brad Schneider

ANALYTICAL REPORT

PROJECT NO: 5406-00
SAMPLE NO'S: 78575 - 78577
EPA APPROVAL NO.: 4043
CLIENT PROJECT:

DATE RECEIVED: 04/13/93
DATE ANALYZED: 04/21/93
DATE REPORTED: 04/23/93

TEST RESULTS

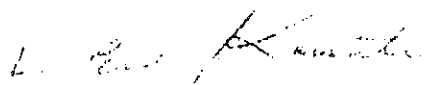
SAL Sample ID: 78575/78576/78577 Composite
Client ID: #1/#2/#3 Composite

GC/MS Semivolatile Fraction

GC/MS analysis of sample #1/#2/#3 Composite shows presence of Benzenedicarboxylic acid derivatives indicative of plastics material. Bis (2-ethylhexyl) phthalate is also present.

Methodology: GC/MS Semivolatile Fraction by SW-846 Method 8130

Respectfully submitted,


L. Eve Karnitis, Chemist

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-1-T
DATE TAKEN: 11/06/95 1000
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31228-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	12.53	mg/kg	EL	11/08/95	7190
Lead	17.78	mg/kg	EL	11/08/95	7420
Toluene	< 5	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 98%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-1-B
DATE TAKEN: 11/06/95 1000
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31232-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	15.05	mg/kg	EL	11/08/95	7190
Lead	12.04	mg/kg	EL	11/08/95	7420
Toluene	16	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 101%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-2-T
DATE TAKEN: 11/06/95 1030
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31229-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	17.8	mg/kg	EL	11/08/95	7190
Lead	64.0	mg/kg	EL	11/08/95	7420
Toluene	351	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 100%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-2-B
DATE TAKEN: 11/06/95 1030
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31233-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	15.07	mg/kg	EL	11/08/95	7190
QC Duplicate	16.20				
Lead	20.89	mg/kg	EL	11/08/95	7420
QC Duplicate	29.59				
Toluene	58	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 101%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-3-T
DATE TAKEN: 11/06/95 1100
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31230-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	14.29	mg/kg	EL	11/08/95	7190
Lead	15.66	mg/kg	EL	11/08/95	7420
Toluene	68,300	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 99%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-3-B
DATE TAKEN: 11/06/95 1100
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31234-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	13.52	mg/kg	EL	11/08/95	7190
Lead	8.55	mg/kg	EL	11/08/95	7420
Toluene	78,800	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 88%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-4-T
DATE TAKEN: 11/06/95 1130
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31231-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	7.98	mg/kg	EL	11/08/95	7190
Lead	22.75	mg/kg	EL	11/08/95	7420
Toluene	142	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 96%.

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0813

Report Date: 11/16/95

Report Released By:

Ed Lockwood Jr., President

PROJECT ID: Closure Report Plan
PROJECT LOCATION: West Side of Building
SAMPLE ID: SB-4-B
DATE TAKEN: 11/06/95 1130
SAMPLER: Jim Parrish
SAMPLE TYPE: Solid/Composite
DATE RECEIVED: 11/06/95

ANALYSIS

SAMPLE LOG #: 31235-999

TEST	RESULT	UNITS	ANALYST	DATE	METHOD
Chromium	8.61	mg/kg	EL	11/08/95	7190
Lead	7.95	mg/kg	EL	11/08/95	7420
Toluene	1,600	ug/kg	BAL	11/08/95	8240

Analysis Notes: Detection Limit for Toluene was
5 ug/kg. Calibration confirmed daily.
The % Recovery for alpha, alpha, alpha-
Trifluorotoluene was 95%.

Lockwood Laboratories

A Springfie' Environmental Inc. Company

C UIN OF
CUSTODY

1001 East St. P.O. Box 2728 Springfield, OH 45501-2728 Tel: (513) 324-8001 FAX: (513) 324-5185

CLIENT		DESIGN CALCULATIONS		PROJECT NAME		SDWA	
ADDRESS		402 JACKSON ST		SAMPLE LOCATION		NPDES	
		JACKSON CTR, OHIO 45334		COLLECTED BY:		RCRA	
		-0812				OTHER	
CONTACT		Pannish Pusey		ANALYSIS REQUESTED		QUOTE	
TELEPHONE		513-596-5121					
PO NUMBER							
SAMPLE ID #	METHOD	GR	SAMPLE TYPE	DATE	TIME	# OF BOTTLES	LAB USE ONLY LOG #
SB-1-T	✓		Solid	11/6/95	10:00	1	31228-999
SB-2-T	✓		"	"	10:30	1	31229-999
SB-3-T	✓		"	"	11:00	1	31230-999
SB-4-T	✓		"	"	11:30	1	31231-999
SB-1-B	✓		"	"	10:00	1	31232-999
SB-2-B	✓		"	"	10:30	1	31233-999
SB-3-B	✓		"	"	11:00	1	31234-999
SB-4-B	✓		"	"	11:30	1	31235-999
COMMENTS: GIVE RESULTS TO JIM PANNISH							
SAMPLE RELINQUISHED BY:		DATE/TIME		SAMPLES RECEIVED BY:		DATE/TIME	
Franklin E. Pusey		11/6/95		Jim S. Pannish		11/6/95 12:15	
SAMPLE RELINQUISHED BY:		DATE/TIME		SAMPLES RECEIVED BY:		DATE/TIME	
SAMPLES RECEIVED IN LAB BY: Jackie Schmidt				TIME		DATE	
				1500		11/6/95	

TERMS & CONDITIONS

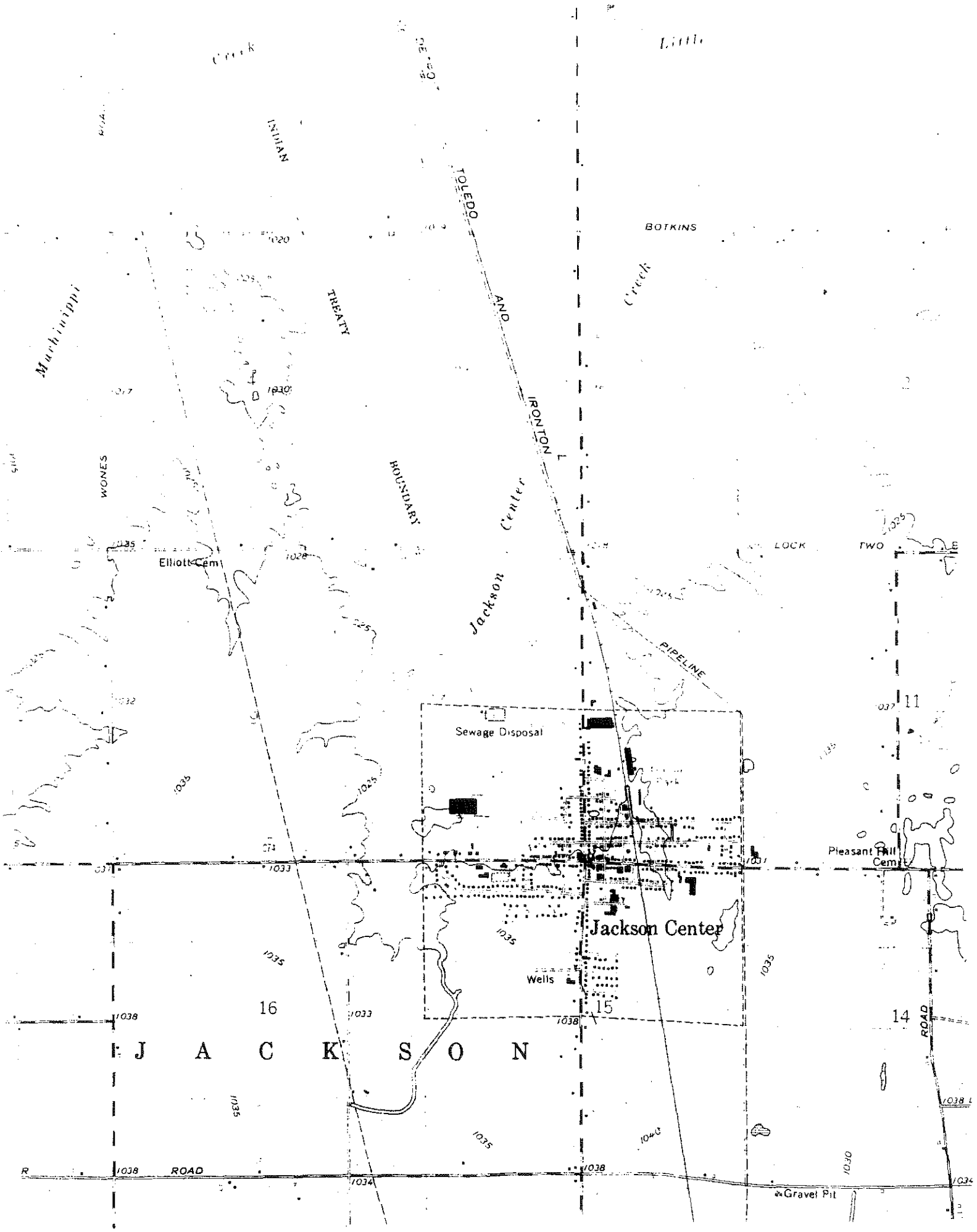
1. Minimum invoice amount is \$25.00
2. Payment terms are NET 30 Days with approved credit. A 2% discount is available for payments within 10 Days. Past due invoices are subject to a finance charge.
3. Submission of Chain of Custody and samples constitutes an agreement to perform the analysis and the client agrees to pay for any analyses completed prior to a notification "not to proceed".
4. Samples found to be "hazardous" will be returned to the client for disposal. Radioactive samples will not be accepted.
5. Complex samples may incur an additional prep charge. Client will be notified before lab proceeds.
6. The fee structure reflects our normal QC/QA protocol. Additional QC/QA will require a surcharge.
7. TURNAROUND TIME (TAT) is usually one week or less. Every effort will be made to accommodate RUSH samples. Additional charges, up to 100%, may be assessed depending on the time requirements. (RUSH FEE)
8. NOTIFICATION OF RUSH SAMPLES IS APPRECIATED!
9. Confidentiality of all data and customer information is strictly adhered to by Lockwood Laboratories and Springfield Environmental.
10. Samples will be analyzed in accordance with approved & standard test procedures to the best of our ability. Lockwood Laboratories, however, cannot be held responsible for the representativeness of the samples. In no event shall Lockwood Laboratories be held liable for the consequences of the data reported and its use, and shall be liable only for the monetary value of the tests.

BACKGROUND HEAVY METAL CONC. IN OHIO SOILS

<u>METAL</u>	<u>NO.</u>	<u>MEAN</u>	<u>STD. DEV.</u>
		----- mg/kg -----	
PB	239	19	5
ZN	239	75	15
CU	239	19	5
NI	239	18	5
CD	237	0.2	0.3

(Logan, Miller, 1983)

APPENDIX "B" REGIONAL MAPS



Design Original, Incorporated

402 Jackson Street
Jackson Center, Ohio 45334-0813WILSON MEMORIAL HOSPITAL
915 W. Michigan
Sidney, OH

513-492-7296

APPENDIX "C" ROLL-OFF TCLP TEST RESULTS

Certificate of Analysis

LOCKWOOD

LABORATORIES

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Est *Pres*
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #1
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

SAMPLE LOG #: 33764-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).

Certificate of Analysis

LOCKWOOD

LABORATORIES

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

E. J. Chaffin
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll off
SAMPLE ID: #2
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

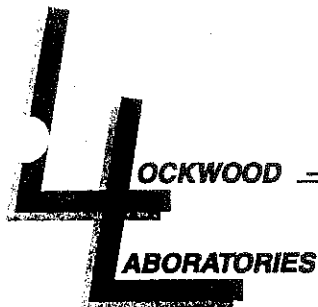
SAMPLE LOG #: 33765-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).

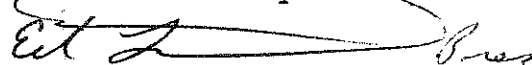


Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

For 
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #3
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

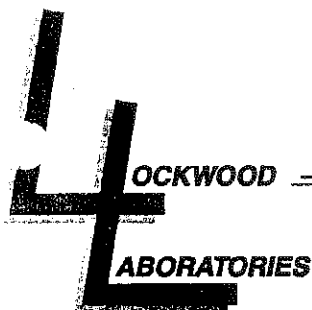
SAMPLE LOG #: 33766-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).



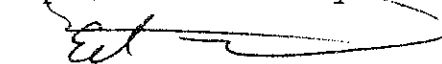
Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

For


Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #4
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

SAMPLE LOG #: 33767-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).

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LABORATORIES

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Et
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #5
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

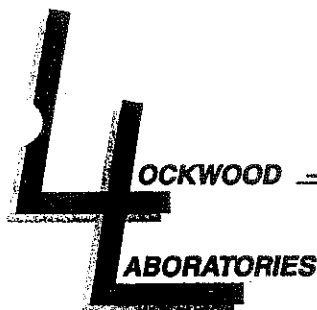
SAMPLE LOG #: 33768-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).



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FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

For

Pres.
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #6
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

SAMPLE LOG #: 33769-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).

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LABORATORIES

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Fa

Ed
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #6
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

SAMPLE LOG #: 33769-999 QC DUPLICATE

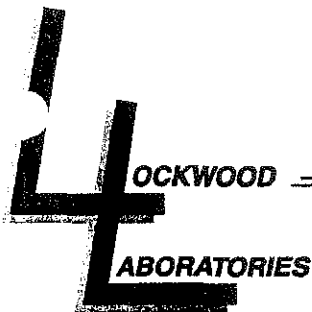
ANALYSIS

EPA HW

NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Metals analysis by 7000 series (AA).



Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: Composite/Roll Offs
SAMPLE TYPE: Soil/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

SAMPLE LOG #: 33764-33769-999

ANALYSIS

EPA HW TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
Flashpoint	> 200	F	JC	05/07/96	1010

L

Lockwood Laboratories

A Springfield Environmental Inc. Company

CHAIN OF
CUSTODY

1001 East St. P.O. Box 2728 Springfield, OH 45501-2728 Tel: (513) 324-8001 FAX: (513) 324-5185

CLIENT		DESIGN ORIGINALS		PROJECT NAME		REMEDIAL ACTION		SDWA	
ADDRESS		402 Jackson St		SAMPLE LOCATION		Roll off by Number		NPDES	
		Jackson Center, OHIO		COLLECTED BY:		FASB		RCRA	
CONTACT		45334-0183		ANALYSIS REQUESTED				OTHER	
TELEPHONE								QUOTE	
PO NUMBER									

SAMPLE ID #	METHOD	GR	COMP	SAMPLE TYPE	DATE	TIME	# OF BOTTLES	TCLP LEACH	TCLP CHRON	TCLP WASTK	LAB/USE ONLY LOG #
Roll off #1	✓			soil	4/26/96	7:30	1	X	X	X	33764-999
" #2	✓			"			1	X	X	X	33765-999
" #3	✓			"			1	X	X	X	33766-999
" #4	✓			"			1	X	X	X	33767-999
" #5	✓			"			1	X	X	X	33768-999
" #6	✓			"			1	X	X	X	33769-999

COMMENTS:

SAMPLE RELINQUISHED BY: *Frank E. Perry* DATE/TIME: *4/26/96* 7:30

SAMPLE RELINQUISHED BY: *James E. Perry* DATE/TIME: *4/26/96* 8:00

SAMPLES RECEIVED IN LAB BY: *James E. Perry* DATE/TIME: *4/26/96* 8:00

TERMS & CONDITIONS

1. Minimum invoice amount is \$25.00

2. Payment terms are NET 30 Days with approved credit. A 2% discount is available for payments within 10 Days. Past due invoices are subject to a finance charge.

3. Submission of Chain of Custody and samples constitutes an agreement to perform the analysis and the client agrees to pay for any analyses completed prior to a notification "not to proceed".

4. Samples found to be "hazardous" will be returned to the client for disposal. Radioactive samples will not be accepted.

5. Complex samples may incur an additional prep charge. Client will be notified before lab proceeds.

6. The fee structure reflects our normal QC/QA protocol. Additional QC/QA will require a surcharge.

7. TURNAROUND TIME (TAT) is usually one week or less. Every effort will be made to accommodate RUSH samples. Additional charges, up to 100%, may be added depending on the time requirements. ADVANCE NOTIFICATION OF RUSH SAMPLES IS APPRECIATED!

8. Confidentiality of all data and customer information is strictly adhered to by Lockwood Laboratories and Springfield Environmental.

9. Samples will be analyzed in accordance with approved & standard test procedures to the best of our ability. Lockwood Laboratories, however, cannot be held responsible for the representativeness of the sample.

In no event shall Lockwood Laboratories be held liable for the consequences of the data reported and its use, and shall be liable only for the monetary value of the tests.

APPENDIX "D" ROLL-OFF "TOTAL" TEST RESULTS

Certificate of Analysis

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LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

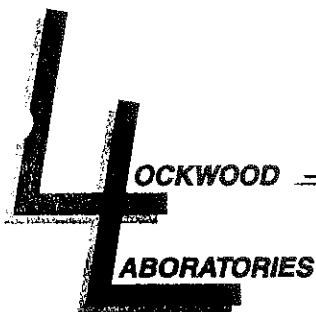
Ed Joseph
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #1
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33764-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



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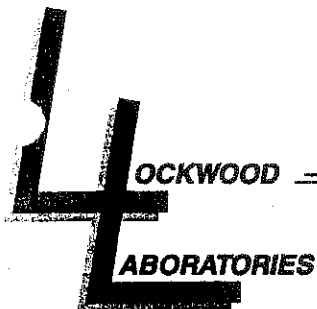
Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #1
SAMPLE LOG #: 33764-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.



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Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

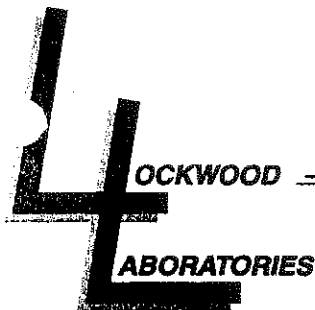
Ed [Signature]
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #2
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33765-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #2
SAMPLE LOG #: 33765-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.

Certificate of Analysis

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LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

EA
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #3
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33766-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

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LABORATORIES

Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #3
SAMPLE LOG #: 33766-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #4
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33767-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #4
SAMPLE LOG #: 33767-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed Joseph
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #5
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33768-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #5
SAMPLE LOG #: 33768-999

COMPONENT	CONCENTRATION (ug/kg)	D.L.
1,4-Dichlorobenzene	< 5	5
trans-1,4-Dichloro-2-butene	< 5	5
Dichlorodifluoromethane	< 10	10
1,1-Dichloroethane	< 5	5
1,2-Dichloroethane	< 5	5
1,1-Dichloroethene	< 5	5
trans-1,2-Dichloroethene	< 5	5
1,2-Dichloropropane	< 5	5
cis-1,3-Dichloropropene	< 5	5
trans-1,3-Dichloropropene	< 5	5
Diethyl Ether	< 5	5
Ethyl Methacrylate	< 50	50
Ethylbenzene	< 5	5
2-Hexanone	< 50	50
Methacrylonitrile	< 50	50
Methyl Iodide	< 10	10
Methyl Methacrylate	< 50	50
Methylene Chloride	< 10	10
4-Methyl-2-Pentanone	< 50	50
Styrene	< 5	5
1,1,1,2-Tetrachloroethane	< 5	5
1,1,2,2-Tetrachloroethane	< 5	5
Tetrachloroethene	< 5	5
Toluene	< 5	5
1,1,1-Trichloroethane	< 5	5
1,1,2-Trichloroethane	< 5	5
Trichloroethene	< 5	5
Trichlorofluoromethane	< 10	10
1,2,3-Trichloropropane	< 5	5
Vinyl Acetate	< 50	50
Vinyl Chloride	< 10	10
m-and p- Xylene	< 5	5
o-Xylene	< 5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed Joseph Chaffin
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #6
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33769-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	< 100		100
Acetonitrile	< 50		50
Acrolein	< 100		100
Acrylonitrile	< 100		100
Allyl Chloride	< 50		50
Benzene	< 5		5
Bromodichloromethane	< 5		5
Bromoform	< 5		5
Bromomethane	< 10		10
2-Butanone	< 50		50
Carbon Disulfide	< 10		10
Carbon Tetrachloride	< 5		5
Chlorobenzene	< 5		5
Chloroethane	< 10		10
2-Chloroethyl Vinyl Ether	< 10		10
Chloroform	< 5		5
Chloromethane	< 10		10
Dibromochloromethane	< 5		5
1,2-Dibromo-3-chloropropane	< 50		50
1,2-Dibromoethane	< 5		5
1,2-Dichlorobenzene	< 5		5
1,3-Dichlorobenzene	< 5		5

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LABORATORIES

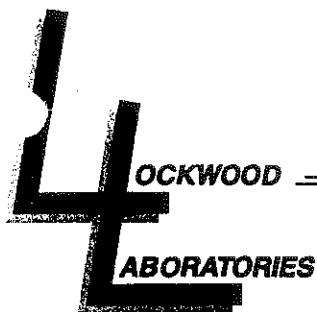
Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #6
SAMPLE LOG #: 33769-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	300		5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.



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FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 1A
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33770-999

COMPONENT	CONCENTRATION (ug/kg)	DETECTION LIMIT
Acetone	< 100	100
Acetonitrile	< 50	50
Acrolein	< 100	100
Acrylonitrile	< 100	100
Allyl Chloride	< 50	50
Benzene	< 5	5
Bromodichloromethane	< 5	5
Bromoform	< 5	5
Bromomethane	< 10	10
2-Butanone	< 50	50
Carbon Disulfide	< 10	10
Carbon Tetrachloride	< 5	5
Chlorobenzene	< 5	5
Chloroethane	< 10	10
2-Chloroethyl Vinyl Ether	< 10	10
Chloroform	< 5	5
Chloromethane	< 10	10
Dibromochloromethane	< 5	5
1,2-Dibromo-3-chloropropane	< 50	50
1,2-Dibromoethane	< 5	5
1,2-Dichlorobenzene	< 5	5
1,3-Dichlorobenzene	< 5	5

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LABORATORIES

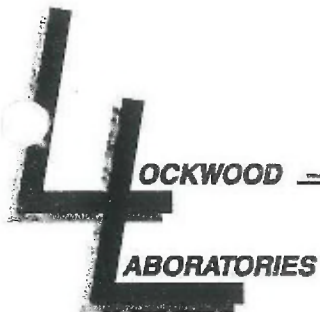
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1A
SAMPLE LOG #: 33770-999

COMPONENT	CONCENTRATION (ug/kg)	D.L.
1,4-Dichlorobenzene	< 5	5
trans-1,4-Dichloro-2-butene	< 5	5
Dichlorodifluoromethane	< 10	10
1,1-Dichloroethane	< 5	5
1,2-Dichloroethane	< 5	5
1,1-Dichloroethene	< 5	5
trans-1,2-Dichloroethene	< 5	5
1,2-Dichloropropane	< 5	5
cis-1,3-Dichloropropene	< 5	5
trans-1,3-Dichloropropene	< 5	5
Diethyl Ether	< 5	5
Ethyl Methacrylate	< 50	50
Ethylbenzene	< 5	5
2-Hexanone	< 50	50
Methacrylonitrile	< 50	50
Methyl Iodide	< 10	10
Methyl Methacrylate	< 50	50
Methylene Chloride	< 10	10
4-Methyl-2-Pentanone	< 50	50
Styrene	< 5	5
1,1,1,2-Tetrachloroethane	< 5	5
1,1,2,2-Tetrachloroethane	< 5	5
Tetrachloroethene	< 5	5
Toluene	< 5	5
1,1,1-Trichloroethane	< 5	5
1,1,2-Trichloroethane	< 5	5
Trichloroethene	< 5	5
Trichlorofluoromethane	< 10	10
1,2,3-Trichloropropane	< 5	5
Vinyl Acetate	< 50	50
Vinyl Chloride	< 10	10
m-and p- Xylene	< 5	5
o-Xylene	< 5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



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FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1A
SAMPLE LOG #: 33770-999

ANALYSIS

TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
Chromium	16.54	mg/kg	EL	04/29/96	7190
Lead	36.52	mg/kg	EL	04/29/96	7420

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 1C
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33771-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

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LABORATORIES

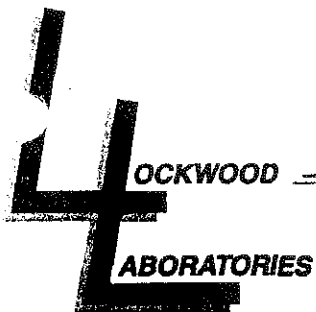
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1C
SAMPLE LOG #: 33771-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

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FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1C
SAMPLE LOG #: 33771-999

ANALYSIS

<u>TEST</u>	<u>RESULTS</u>	<u>UNITS</u>	<u>ANALYST</u>	<u>DATE</u>	<u>METHOD</u>
Chromium	9.61	mg/kg	EL	04/29/96	7190
Lead	9.61	mg/kg	EL	04/29/96	7420

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 2A
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33772-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2A
SAMPLE LOG #: 33772-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2A
SAMPLE LOG #: 33772-999

ANALYSIS

<u>TEST</u>	<u>RESULTS</u>	<u>UNITS</u>	<u>ANALYST</u>	<u>DATE</u>	<u>METHOD</u>
Chromium	10.61	mg/kg	EL	04/29/96	7190
Lead	12.99	mg/kg	EL	04/29/96	7420

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

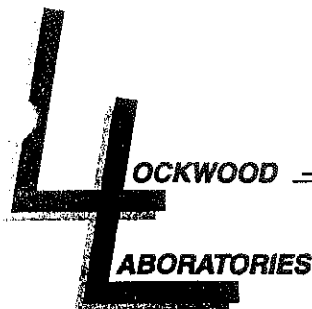
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 2C
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33773-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

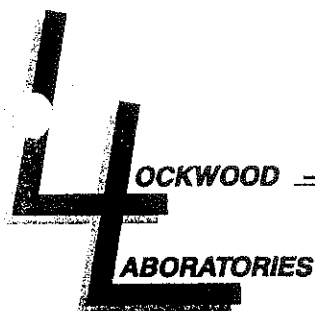
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FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2C
SAMPLE LOG #: 33773-999

COMPONENT	CONCENTRATION	(ug/kg)	D. L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

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FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2C
SAMPLE LOG #: 33773-999

ANALYSIS

<u>TEST</u>	<u>RESULTS</u>	<u>UNITS</u>	<u>ANALYST</u>	<u>DATE</u>	<u>METHOD</u>
Chromium	13.64	mg/kg	EL	04/29/96	7190
Lead	22.84	mg/kg	EL	04/29/96	7420

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

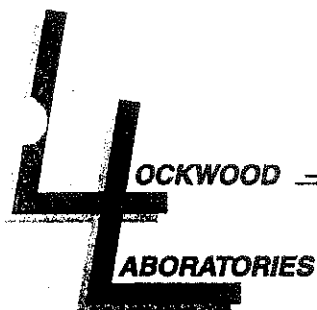
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 3A
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33774-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3A
SAMPLE LOG #: 33774-999

COMPONENT	CONCENTRATION (ug/kg)	D.L.
1,4-Dichlorobenzene	< 5	5
trans-1,4-Dichloro-2-butene	< 5	5
Dichlorodifluoromethane	< 10	10
1,1-Dichloroethane	< 5	5
1,2-Dichloroethane	< 5	5
1,1-Dichloroethene	< 5	5
trans-1,2-Dichloroethene	< 5	5
1,2-Dichloropropane	< 5	5
cis-1,3-Dichloropropene	< 5	5
trans-1,3-Dichloropropene	< 5	5
Diethyl Ether	< 5	5
Ethyl Methacrylate	< 50	50
Ethylbenzene	< 5	5
2-Hexanone	< 50	50
Methacrylonitrile	< 50	50
Methyl Iodide	< 10	10
Methyl Methacrylate	< 50	50
Methylene Chloride	< 10	10
4-Methyl-2-Pentanone	< 50	50
Styrene	< 5	5
1,1,1,2-Tetrachloroethane	< 5	5
1,1,2,2-Tetrachloroethane	< 5	5
Tetrachloroethene	< 5	5
Toluene	< 5	5
1,1,1-Trichloroethane	< 5	5
1,1,2-Trichloroethane	< 5	5
Trichloroethene	< 5	5
Trichlorofluoromethane	< 10	10
1,2,3-Trichloropropane	< 5	5
Vinyl Acetate	< 50	50
Vinyl Chloride	< 10	10
m-and p- Xylene	< 5	5
o-Xylene	< 5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.

Certificate of Analysis

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LABORATORIES

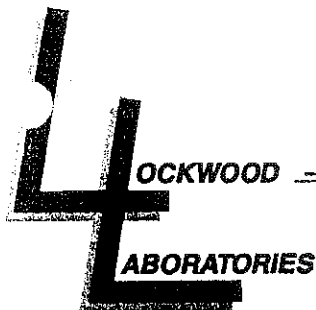
Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3A
SAMPLE LOG #: 33774-999

ANALYSIS

<u>TEST</u>	<u>RESULTS</u>	<u>UNITS</u>	<u>ANALYST</u>	<u>DATE</u>	<u>METHOD</u>
Chromium	10.78	mg/kg	EL	04/29/96	7190
Lead	31.10	mg/kg	EL	04/29/96	7420



Certificate of Analysis

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

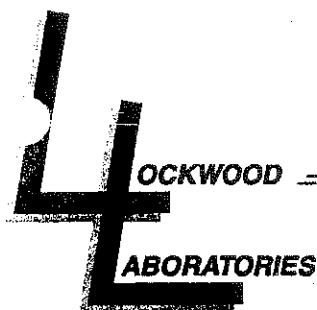
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 3C
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33775-999

COMPONENT	CONCENTRATION (ug/kg)	DETECTION LIMIT
Acetone	< 100	100
Acetonitrile	< 50	50
Acrolein	< 100	100
Acrylonitrile	< 100	100
Allyl Chloride	< 50	50
Benzene	< 5	5
Bromodichloromethane	< 5	5
Bromoform	< 5	5
Bromomethane	< 10	10
2-Butanone	< 50	50
Carbon Disulfide	< 10	10
Carbon Tetrachloride	< 5	5
Chlorobenzene	< 5	5
Chloroethane	< 10	10
2-Chloroethyl Vinyl Ether	< 10	10
Chloroform	< 5	5
Chloromethane	< 10	10
Dibromochloromethane	< 5	5
1,2-Dibromo-3-chloropropane	< 50	50
1,2-Dibromoethane	< 5	5
1,2-Dichlorobenzene	< 5	5
1,3-Dichlorobenzene	< 5	5



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Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3C
SAMPLE LOG #: 33775-999

COMPONENT	CONCENTRATION (ug/kg)	D.L.
1,4-Dichlorobenzene	< 5	5
trans-1,4-Dichloro-2-butene	< 5	5
Dichlorodifluoromethane	< 10	10
1,1-Dichloroethane	< 5	5
1,2-Dichloroethane	< 5	5
1,1-Dichloroethene	< 5	5
trans-1,2-Dichloroethene	< 5	5
1,2-Dichloropropane	< 5	5
cis-1,3-Dichloropropene	< 5	5
trans-1,3-Dichloropropene	< 5	5
Diethyl Ether	< 5	5
Ethyl Methacrylate	< 50	50
Ethylbenzene	< 5	5
2-Hexanone	< 50	50
Methacrylonitrile	< 50	50
Methyl Iodide	< 10	10
Methyl Methacrylate	< 50	50
Methylene Chloride	< 10	10
4-Methyl-2-Pentanone	< 50	50
Styrene	< 5	5
1,1,1,2-Tetrachloroethane	< 5	5
1,1,2,2-Tetrachloroethane	< 5	5
Tetrachloroethene	< 5	5
Toluene	< 5	5
1,1,1-Trichloroethane	< 5	5
1,1,2-Trichloroethane	< 5	5
Trichloroethene	< 5	5
Trichlorofluoromethane	< 10	10
1,2,3-Trichloropropane	< 5	5
Vinyl Acetate	< 50	50
Vinyl Chloride	< 10	10
m-and p- Xylene	< 5	5
o-Xylene	< 5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.

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LABORATORIES

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FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3C
SAMPLE LOG #: 33775-999

ANALYSIS

TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
Chromium	11.25	mg/kg	EL	04/29/96	7190
Lead	17.74	mg/kg	EL	04/29/96	7420

Certificate of Analysis

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LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

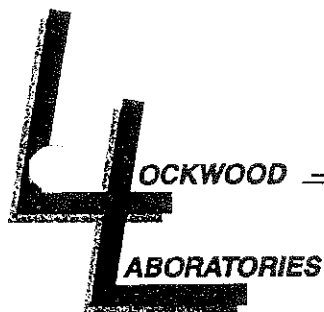
Ed Joseph
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #1
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33764-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



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FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #1
SAMPLE LOG #: 33764-999

COMPONENT	CONCENTRATION (ug/kg)	D.L.
1,4-Dichlorobenzene	< 5	5
trans-1,4-Dichloro-2-butene	< 5	5
Dichlorodifluoromethane	< 10	10
1,1-Dichloroethane	< 5	5
1,2-Dichloroethane	< 5	5
1,1-Dichloroethene	< 5	5
trans-1,2-Dichloroethene	< 5	5
1,2-Dichloropropane	< 5	5
cis-1,3-Dichloropropene	< 5	5
trans-1,3-Dichloropropene	< 5	5
Diethyl Ether	< 5	5
Ethyl Methacrylate	< 50	50
Ethylbenzene	< 5	5
2-Hexanone	< 50	50
Methacrylonitrile	< 50	50
Methyl Iodide	< 10	10
Methyl Methacrylate	< 50	50
Methylene Chloride	< 10	10
4-Methyl-2-Pentanone	< 50	50
Styrene	< 5	5
1,1,1,2-Tetrachloroethane	< 5	5
1,1,2,2-Tetrachloroethane	< 5	5
Tetrachloroethene	< 5	5
Toluene	< 5	5
1,1,1-Trichloroethane	< 5	5
1,1,2-Trichloroethane	< 5	5
Trichloroethene	< 5	5
Trichlorofluoromethane	< 10	10
1,2,3-Trichloropropane	< 5	5
Vinyl Acetate	< 50	50
Vinyl Chloride	< 10	10
m-and p- Xylene	< 5	5
o-Xylene	< 5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.

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LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

E. J. Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #2
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33765-999

COMPONENT	CONCENTRATION (ug/kg)	DETECTION LIMIT
Acetone	< 100	100
Acetonitrile	< 50	50
Acrolein	< 100	100
Acrylonitrile	< 100	100
Allyl Chloride	< 50	50
Benzene	< 5	5
Bromodichloromethane	< 5	5
Bromoform	< 5	5
Bromomethane	< 10	10
2-Butanone	< 50	50
Carbon Disulfide	< 10	10
Carbon Tetrachloride	< 5	5
Chlorobenzene	< 5	5
Chloroethane	< 10	10
2-Chloroethyl Vinyl Ether	< 10	10
Chloroform	< 5	5
Chloromethane	< 10	10
Dibromochloromethane	< 5	5
1,2-Dibromo-3-chloropropane	< 50	50
1,2-Dibromoethane	< 5	5
1,2-Dichlorobenzene	< 5	5
1,3-Dichlorobenzene	< 5	5

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LABORATORIES

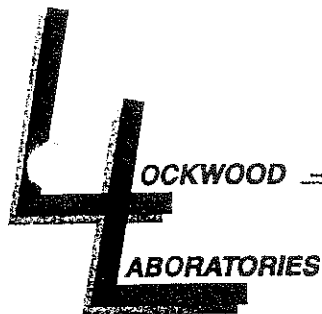
Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #2
SAMPLE LOG #: 33765-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.



Certificate of Analysis

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

EA
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #3
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33766-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

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LABORATORIES

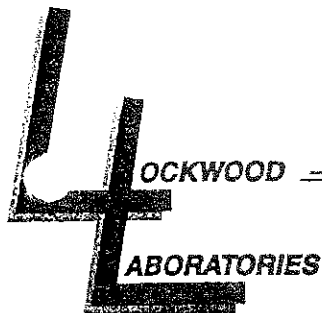
Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #3
SAMPLE LOG #: 33766-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.



Certificate of Analysis

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #4
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33767-999

COMPONENT	CONCENTRATION (ug/kg)	DETECTION LIMIT
Acetone	< 100	100
Acetonitrile	< 50	50
Acrolein	< 100	100
Acrylonitrile	< 100	100
Allyl Chloride	< 50	50
Benzene	< 5	5
Bromodichloromethane	< 5	5
Bromoform	< 5	5
Bromomethane	< 10	10
2-Butanone	< 50	50
Carbon Disulfide	< 10	10
Carbon Tetrachloride	< 5	5
Chlorobenzene	< 5	5
Chloroethane	< 10	10
2-Chloroethyl Vinyl Ether	< 10	10
Chloroform	< 5	5
Chloromethane	< 10	10
Dibromochloromethane	< 5	5
1,2-Dibromo-3-chloropropane	< 50	50
1,2-Dibromoethane	< 5	5
1,2-Dichlorobenzene	< 5	5
1,3-Dichlorobenzene	< 5	5

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LABORATORIES

Certificate of Analysis

Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #4
SAMPLE LOG #: 33767-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate.	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

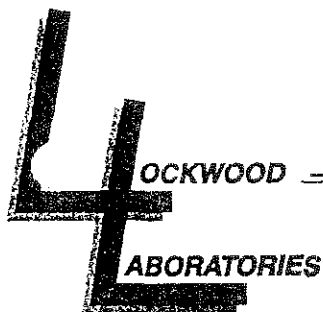
Ed [Signature]
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #5
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33768-999

COMPONENT	CONCENTRATION (ug/kg)	DETECTION LIMIT
Acetone	< 100	100
Acetonitrile	< 50	50
Acrolein	< 100	100
Acrylonitrile	< 100	100
Allyl Chloride	< 50	50
Benzene	< 5	5
Bromodichloromethane	< 5	5
Bromoform	< 5	5
Bromomethane	< 10	10
2-Butanone	< 50	50
Carbon Disulfide	< 10	10
Carbon Tetrachloride	< 5	5
Chlorobenzene	< 5	5
Chloroethane	< 10	10
2-Chloroethyl Vinyl Ether	< 10	10
Chloroform	< 5	5
Chloromethane	< 10	10
Dibromochloromethane	< 5	5
1,2-Dibromo-3-chloropropane	< 50	50
1,2-Dibromoethane	< 5	5
1,2-Dichlorobenzene	< 5	5
1,3-Dichlorobenzene	< 5	5



Certificate of Analysis

Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #5
SAMPLE LOG #: 33768-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed [Signature]
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #6
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33769-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

Certificate of Analysis

LOCKWOOD

LABORATORIES

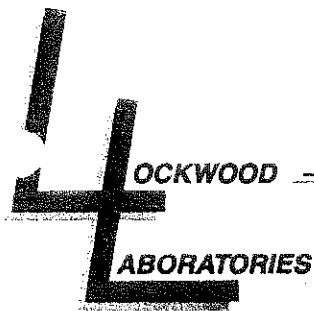
Page 2 of 2

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: Roll Off #6
SAMPLE LOG #: 33769-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	300		5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/15/96.



Certificate of Analysis

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed [Signature]
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #6
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33769-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

Certificate of Analysis

LOCKWOOD

LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

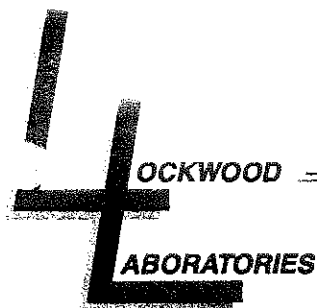
Ed. Joe
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #5
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33768-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #4
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33767-999

COMPONENT	CONCENTRATION (ug/kg)	DETECTION LIMIT
Acetone	< 100	100
Acetonitrile	< 50	50
Acrolein	< 100	100
Acrylonitrile	< 100	100
Allyl Chloride	< 50	50
Benzene	< 5	5
Bromodichloromethane	< 5	5
Bromoform	< 5	5
Bromomethane	< 10	10
2-Butanone	< 50	50
Carbon Disulfide	< 10	10
Carbon Tetrachloride	< 5	5
Chlorobenzene	< 5	5
Chloroethane	< 10	10
2-Chloroethyl Vinyl Ether	< 10	10
Chloroform	< 5	5
Chloromethane	< 10	10
Dibromochloromethane	< 5	5
1,2-Dibromo-3-chloropropane	< 50	50
1,2-Dibromoethane	< 5	5
1,2-Dichlorobenzene	< 5	5
1,3-Dichlorobenzene	< 5	5

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LABORATORIES

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

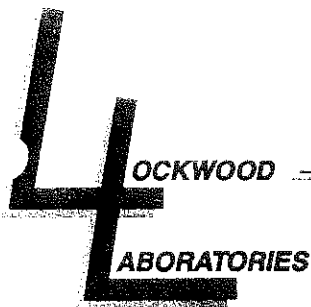
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #3
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33766-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



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Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

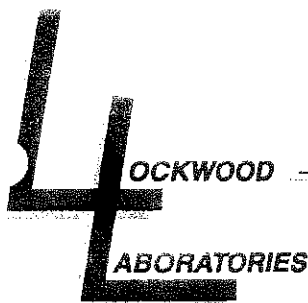
Eck
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #2
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33765-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION
			LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

Page 1 of 2

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/15/96

Report Released By:

Ed Joseph Chaffin
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation
SAMPLE ID: Roll Off #1
SAMPLER: Fred Fitzsimmons
COUNTY: nm
SAMPLE TYPE: Solid/Composite
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33764-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5

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SPRINGFIELD DISTRICT

Certificate of Analysis

LOCKWOOD

LABORATORIES

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Joe Chaffin
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #1
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

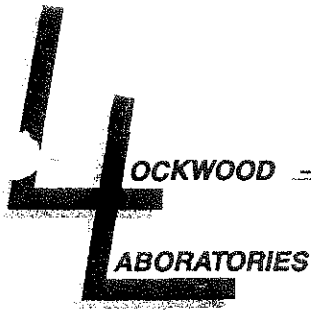
SAMPLE LOG #: 33764-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL (mg/l)	RESULTS (mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).



Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Ed Chaffin
For Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #2
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

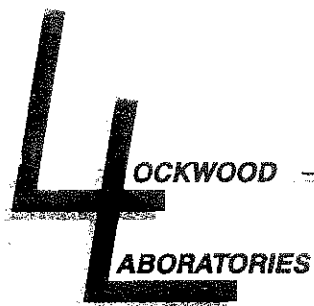
SAMPLE LOG #: 33765-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).



Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Joe
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #3
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

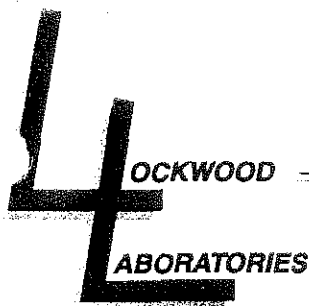
SAMPLE LOG #: 33766-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).

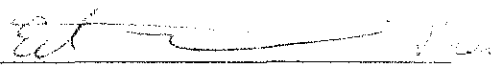


Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

For 
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #4
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

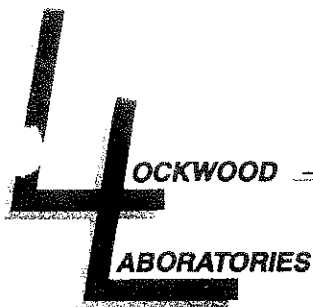
SAMPLE LOG #: 33767-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).



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FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Et
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #5
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

SAMPLE LOG #: 33768-999

ANALYSIS

EPA HW

NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).

Certificate of Analysis

LOCKWOOD

LABORATORIES

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #6
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

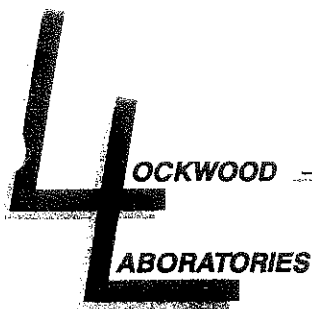
SAMPLE LOG #: 33769-999

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100
D018	Benzene	0.5	< 0.100
D019	Carbon Tetrachloride	0.5	< 0.100
D021	Chlorobenzene	100.0	< 0.100
D022	Chloroform	6.0	< 0.100
D027	1,4-Dichlorobenzene	7.5	< 0.100
D028	1,2-Dichloroethane	0.5	< 0.100
D029	1,1-Dichloroethylene	0.7	< 0.100
D035	Methyl ethyl ketone	200.0	< 0.500
D039	Tetrachloroethylene	0.7	< 0.100
D040	Trichloroethylene	0.5	< 0.100
D043	Vinyl Chloride	0.2	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Volatile analysis by Method 8260.
3. Metals analysis by 7000 series (AA).



Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/03/96

Report Released By:

For 
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: #6
SAMPLE TYPE: Solid/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

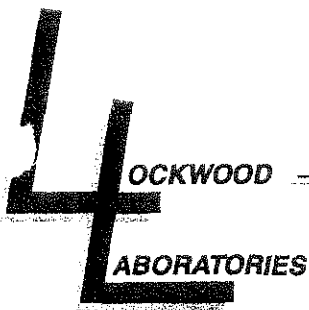
SAMPLE LOG #: 33769-999 QC DUPLICATE

ANALYSIS

EPA HW NUMBER	CONTAMINANT	REGULATORY LEVEL(mg/l)	RESULTS(mg/l)
D007	Chromium	5.0	< 0.050
D008	Lead	5.0	< 0.100

Analysis Notes:

1. TCLP by Method SW846-1311.
2. Metals analysis by 7000 series (AA).



Certificate of Analysis

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation/Roll Off
SAMPLE ID: Composite/Roll Offs
SAMPLE TYPE: Soil/Composite
SAMPLER: Fred Fitzsimmons
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

SAMPLE LOG #: 33764-33769-999

ANALYSIS

EPA HW	TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
	Flashpoint	> 200	F	JC	05/07/96	1010

L

Lockwood Laboratories

A Springfield Environmental Inc. Company

CHAIN OF
CUSTODY

1001 East St. P.O. Box 2728 Springfield, OH 45501-2728 Tel: (513) 324-8001 FAX: (513) 324-5185

CLIENT <i>Springfield Environmental</i>		PROJECT NAME <i>Lockwood</i>		SDWA
ADDRESS <i>4337 Washington St</i>		SAMPLE LOCATION <i>Lockwood by Dayton</i>		NPDES
CONTACT <i>Jackson Center 10410</i>		COLLECTED BY: <i>BSU</i>		RCRA
TELEPHONE <i>433334-0183</i>		ANALYSIS REQUESTED		OTHER
PO NUMBER				QUOTE

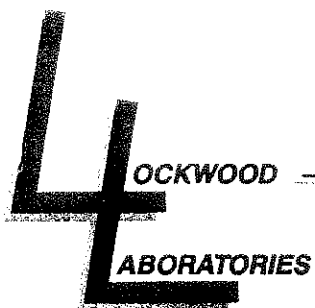
SAMPLE ID #	METHOD	GR	SAMPLE TYPE	DATE	TIME	# OF BOTTLES	DATE/TIME	DATE/TIME	REQUESTED DUE DATE
R-11-11-1			Solid	4/27/96	7:30 PM	1			7:30
" #2			"			1			4/28/96 PM
" #3			"			1			
" #4			"			1			
" #5			"			1			
" #6			"			1			

COMMENTS:		SAMPLES RECEIVED BY: <i>Thomas E. Sample</i>		DATE/TIME	7:30
		SAMPLES RECEIVED BY:		DATE/TIME	

SAMPLES RECEIVED IN LAB BY:		TIME	DATE
<i>Springfield</i>		1350	4/29/96

TERMS & CONDITIONS

- Minimum invoice amount is \$25.00
- Payment terms are NET 30 Days with approved credit. A 2% discount is available for payments within 10 Days. Past due invoices are subject to a finance charge.
- Submission of Chain of Custody and samples constitutes an agreement to perform the analysis and the client agrees to pay for any analyses completed prior to a notification "not to proceed".
- Samples found to be "hazardous" will be returned to the client for disposal. Radioactive samples will not be accepted.
- Complex samples may incur an additional prep charge. Client will be notified before lab proceeds.
- The fee structure reflects our normal QC/QA protocol. Additional QC/QA will require a surcharge.
- TURNAROUND TIME (TAT) is usually one week or less. Every effort will be made to accommodate RUSH samples. Additional charges, up to 100%, may be added depending on the time requirements. ADVANCE NOTIFICATION OF RUSH SAMPLES IS APPRECIATED!
- Confidentiality of all data and customer information is strictly adhered to by Lockwood Laboratories and Springfield Environmental.
- Samples will be analyzed in accordance with approved & standard test procedures to the best of our ability. Lockwood Laboratories, however, cannot be held responsible for the representativeness of the sample. In no event shall Lockwood Laboratories be held liable for the consequences of the data reported and its use, and shall be liable only for the monetary value of the tests.



Certificate of Analysis

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

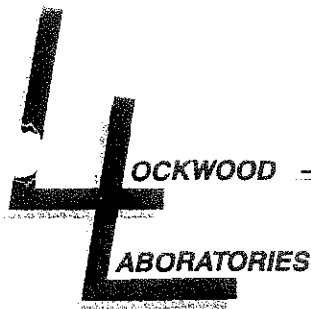
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 1A
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33770-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

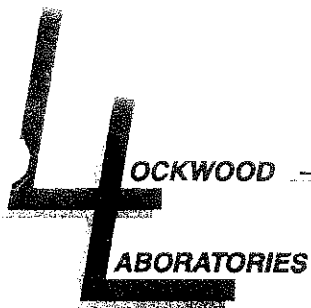
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1A
SAMPLE LOG #: 33770-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

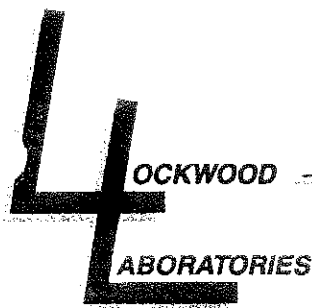
Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1A
SAMPLE LOG #: 33770-999

ANALYSIS

<u>TEST</u>	<u>RESULTS</u>	<u>UNITS</u>	<u>ANALYST</u>	<u>DATE</u>	<u>METHOD</u>
Chromium	16.54	mg/kg	EL	04/29/96	7190
Lead	36.52	mg/kg	EL	04/29/96	7420



Certificate of Analysis

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

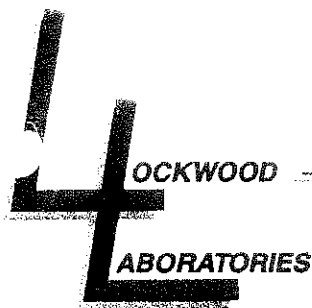
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 1C
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33771-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	< 100		100
Acetonitrile	< 50		50
Acrolein	< 100		100
Acrylonitrile	< 100		100
Allyl Chloride	< 50		50
Benzene	< 5		5
Bromodichloromethane	< 5		5
Bromoform	< 5		5
Bromomethane	< 10		10
2-Butanone	< 50		50
Carbon Disulfide	< 10		10
Carbon Tetrachloride	< 5		5
Chlorobenzene	< 5		5
Chloroethane	< 10		10
2-Chloroethyl Vinyl Ether	< 10		10
Chloroform	< 5		5
Chloromethane	< 10		10
Dibromochloromethane	< 5		5
1,2-Dibromo-3-chloropropane	< 50		50
1,2-Dibromoethane	< 5		5
1,2-Dichlorobenzene	< 5		5
1,3-Dichlorobenzene	< 5		5



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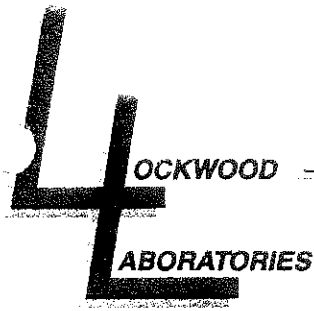
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1C
SAMPLE LOG #: 33771-999

COMPONENT	CONCENTRATION (ug/kg)	D.L.
1,4-Dichlorobenzene	< 5	5
trans-1,4-Dichloro-2-butene	< 5	5
Dichlorodifluoromethane	< 10	10
1,1-Dichloroethane	< 5	5
1,2-Dichloroethane	< 5	5
1,1-Dichloroethene	< 5	5
trans-1,2-Dichloroethene	< 5	5
1,2-Dichloropropane	< 5	5
cis-1,3-Dichloropropene	< 5	5
trans-1,3-Dichloropropene	< 5	5
Diethyl Ether	< 5	5
Ethyl Methacrylate	< 50	50
Ethylbenzene	< 5	5
2-Hexanone	< 50	50
Methacrylonitrile	< 50	50
Methyl Iodide	< 10	10
Methyl Methacrylate	< 50	50
Methylene Chloride	< 10	10
4-Methyl-2-Pentanone	< 50	50
Styrene	< 5	5
1,1,1,2-Tetrachloroethane	< 5	5
1,1,2,2-Tetrachloroethane	< 5	5
Tetrachloroethene	< 5	5
Toluene	< 5	5
1,1,1-Trichloroethane	< 5	5
1,1,2-Trichloroethane	< 5	5
Trichloroethene	< 5	5
Trichlorofluoromethane	< 10	10
1,2,3-Trichloropropane	< 5	5
Vinyl Acetate	< 50	50
Vinyl Chloride	< 10	10
m-and p- Xylene	< 5	5
o-Xylene	< 5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

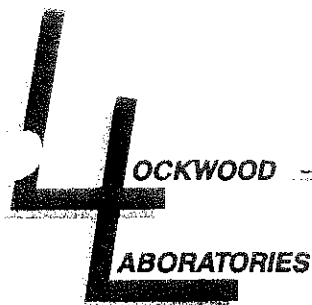
Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 1C
SAMPLE LOG #: 33771-999

ANALYSIS

TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
Chromium	9.61	mg/kg	EL	04/29/96	7190
Lead	9.61	mg/kg	EL	04/29/96	7420



Certificate of Analysis

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

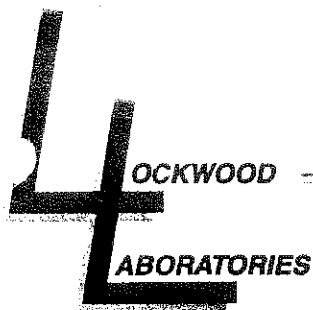
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 2A
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33772-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



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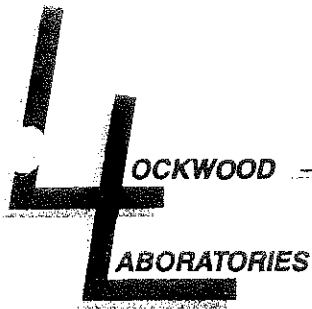
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2A
SAMPLE LOG #: 33772-999

COMPONENT	CONCENTRATION (ug/kg)	D.L.
1,4-Dichlorobenzene	< 5	5
trans-1,4-Dichloro-2-butene	< 5	5
Dichlorodifluoromethane	< 10	10
1,1-Dichloroethane	< 5	5
1,2-Dichloroethane	< 5	5
1,1-Dichloroethene	< 5	5
trans-1,2-Dichloroethene	< 5	5
1,2-Dichloropropane	< 5	5
cis-1,3-Dichloropropene	< 5	5
trans-1,3-Dichloropropene	< 5	5
Diethyl Ether	< 5	5
Ethyl Methacrylate	< 50	50
Ethylbenzene	< 5	5
2-Hexanone	< 50	50
Methacrylonitrile	< 50	50
Methyl Iodide	< 10	10
Methyl Methacrylate	< 50	50
Methylene Chloride	< 10	10
4-Methyl-2-Pentanone	< 50	50
Styrene	< 5	5
1,1,1,2-Tetrachloroethane	< 5	5
1,1,2,2-Tetrachloroethane	< 5	5
Tetrachloroethene	< 5	5
Toluene	< 5	5
1,1,1-Trichloroethane	< 5	5
1,1,2-Trichloroethane	< 5	5
Trichloroethene	< 5	5
Trichlorofluoromethane	< 10	10
1,2,3-Trichloropropane	< 5	5
Vinyl Acetate	< 50	50
Vinyl Chloride	< 10	10
m-and p- Xylene	< 5	5
o-Xylene	< 5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

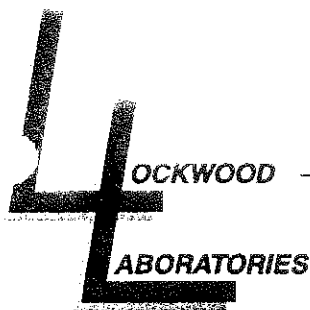
Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2A
SAMPLE LOG #: 33772-999

ANALYSIS

TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
Chromium	10.61	mg/kg	EL	04/29/96	7190
Lead	12.99	mg/kg	EL	04/29/96	7420



Certificate of Analysis

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

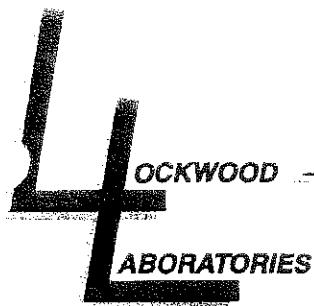
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 2C
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33773-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

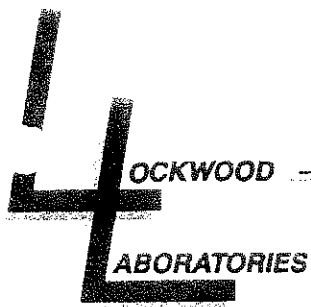
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2C
SAMPLE LOG #: 33773-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

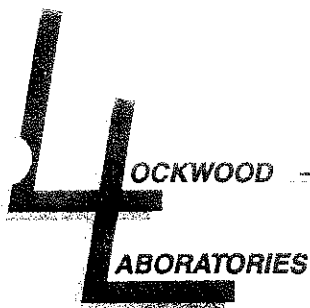
Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 2C
SAMPLE LOG #: 33773-999

ANALYSIS

TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
Chromium	13.64	mg/kg	EL	04/29/96	7190
Lead	22.84	mg/kg	EL	04/29/96	7420



Certificate of Analysis

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

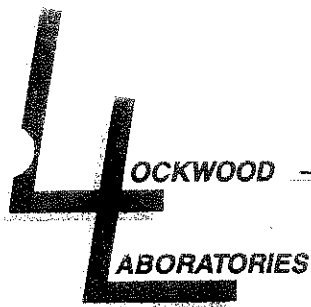
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 3A
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33774-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

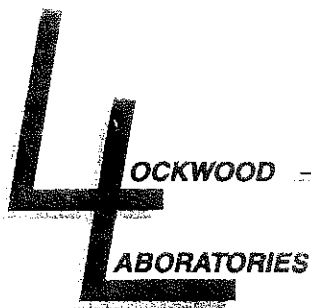
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3A
SAMPLE LOG #: 33774-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3A
SAMPLE LOG #: 33774-999

ANALYSIS

<u>TEST</u>	<u>RESULTS</u>	<u>UNITS</u>	<u>ANALYST</u>	<u>DATE</u>	<u>METHOD</u>
Chromium	10.78	mg/kg	EL	04/29/96	7190
Lead	31.10	mg/kg	EL	04/29/96	7420



Certificate of Analysis

Page 1 of 3

FRANK PUSEY
DESIGN ORIGINALS
402 JACKSON STREET
JACKSON CENTER OH 45334-0183

Report Date: 05/07/96

Report Released By:

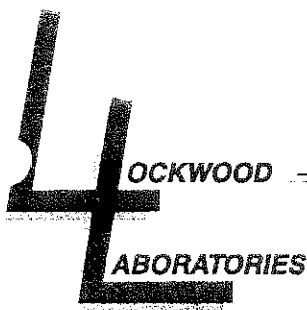
Joseph Chaffin
Joseph Chaffin, Lab Mgr.

PROJECT NAME: Remediation Closure
SAMPLE ID: 3C
SAMPLER: Fred Fitzsimmons
COUNTY: Clark
SAMPLE TYPE: Solid/Grab
DATE TAKEN: 04/26/96 1930
DATE RECEIVED: 04/29/96

ANALYSIS

SAMPLE LOG #: 33775-999

COMPONENT	CONCENTRATION	(ug/kg)	DETECTION LIMIT
Acetone	<	100	100
Acetonitrile	<	50	50
Acrolein	<	100	100
Acrylonitrile	<	100	100
Allyl Chloride	<	50	50
Benzene	<	5	5
Bromodichloromethane	<	5	5
Bromoform	<	5	5
Bromomethane	<	10	10
2-Butanone	<	50	50
Carbon Disulfide	<	10	10
Carbon Tetrachloride	<	5	5
Chlorobenzene	<	5	5
Chloroethane	<	10	10
2-Chloroethyl Vinyl Ether	<	10	10
Chloroform	<	5	5
Chloromethane	<	10	10
Dibromochloromethane	<	5	5
1,2-Dibromo-3-chloropropane	<	50	50
1,2-Dibromoethane	<	5	5
1,2-Dichlorobenzene	<	5	5
1,3-Dichlorobenzene	<	5	5



Certificate of Analysis

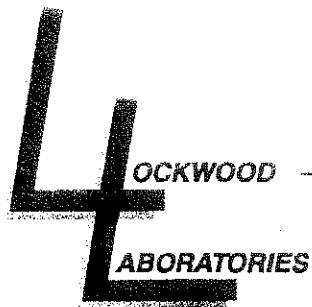
Page 2 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3C
SAMPLE LOG #: 33775-999

COMPONENT	CONCENTRATION	(ug/kg)	D.L.
1,4-Dichlorobenzene	<	5	5
trans-1,4-Dichloro-2-butene	<	5	5
Dichlorodifluoromethane	<	10	10
1,1-Dichloroethane	<	5	5
1,2-Dichloroethane	<	5	5
1,1-Dichloroethene	<	5	5
trans-1,2-Dichloroethene	<	5	5
1,2-Dichloropropane	<	5	5
cis-1,3-Dichloropropene	<	5	5
trans-1,3-Dichloropropene	<	5	5
Diethyl Ether	<	5	5
Ethyl Methacrylate	<	50	50
Ethylbenzene	<	5	5
2-Hexanone	<	50	50
Methacrylonitrile	<	50	50
Methyl Iodide	<	10	10
Methyl Methacrylate	<	50	50
Methylene Chloride	<	10	10
4-Methyl-2-Pentanone	<	50	50
Styrene	<	5	5
1,1,1,2-Tetrachloroethane	<	5	5
1,1,2,2-Tetrachloroethane	<	5	5
Tetrachloroethene	<	5	5
Toluene	<	5	5
1,1,1-Trichloroethane	<	5	5
1,1,2-Trichloroethane	<	5	5
Trichloroethene	<	5	5
Trichlorofluoromethane	<	10	10
1,2,3-Trichloropropane	<	5	5
Vinyl Acetate	<	50	50
Vinyl Chloride	<	10	10
m-and p- Xylene	<	5	5
o-Xylene	<	5	5

METHODOLOGY: Volatiles by Method SW846 8240, analyzed by BAL
on 05/01/96.



Certificate of Analysis

Page 3 of 3

FRANK PUSEY
DESIGN ORIGINALS

SAMPLE ID: 3C
SAMPLE LOG #: 33775-999

ANALYSIS

TEST	RESULTS	UNITS	ANALYST	DATE	METHOD
Chromium	11.25	mg/kg	EL	04/29/96	7190
Lead	17.74	mg/kg	EL	04/29/96	7420

4

Lockwood Laboratories

A Springfield Environmental Inc. Company

CHAIN OF CUSTODY

1001 East St. P.O. Box 2728 Springfield, OH 45501-2728 Tel: (513) 324-8001 FAX: (513) 324-5185

CLIENT	DESIGN ORIGINALS				PROJECT NAME	Remediation Closure										SDWA					
ADDRESS	402 Jackson Street				SAMPLE LOCATION	See Chain of Custody										NPDES					
CONTACT	FRANK JOSEY				COLLECTED BY:	FRED										RCRA					
TELEPHONE					ANALYSIS REQUESTED															OTHER	
PO NUMBER																				QUOTE	
SAMPLE ID #	METHOD	GR	COMP	SAMPLE TYPE	DATE	TIME	# OF BOTTLES											LAB USE ONLY LOG #			
1A Closure	✓			Solid	4/26/96	7:30	1											33770-999			
1C "	✓						1											33771-999			
2A "	✓						1											33772-999			
2C "	✓						1											33773-999			
3A "	✓						1											33774-999			
3C "	✓						1											33775-999			
COMMENTS: TOTAL LEAD BATHING																					
SAMPLE RELINQUISHED BY:				Thomson 2.1 Mary				SAMPLES RECEIVED BY:				Thomson 2.1 Mary				DATE/TIME	4/26/96 7:30	REQUESTED DUE DATE			
SAMPLE RELINQUISHED BY:								SAMPLES RECEIVED BY:								DATE/TIME					
SAMPLES RECEIVED IN LAB BY:																	TIME	1355	DATE	4/29/96	RUSH: YES NO
TERMS & CONDITIONS																					

1. Minimum invoice amount is \$25.00
2. Payment terms are NET 30 Days with approved credit. A 2% discount is available for payments within 10 Days. Past due invoices are subject to a finance charge.
3. Submission of Chain of Custody and samples constitutes an agreement to perform the analysis and the client agrees to pay for any analyses completed prior to a notification "not to proceed".
4. Samples found to be "hazardous" will be returned to the client for disposal. Radioactive samples will not be accepted.
5. Complex samples may incur an additional prep charge. Client will be notified before lab proceeds.
6. The fee structure reflects our normal QC/QA protocol. Additional QC/QA will require a surcharge.
7. TURNAROUND TIME (TAT) is usually one week or less. Every effort will be made to accommodate RUSH samples. Additional charges, up to 100%, may be added depending on the time requirements. ADVANCE NOTIFICATION OF RUSH SAMPLES IS APPRECIATED!
8. Confidentiality of all data and customer information is strictly adhered to by Lockwood Laboratories and Springfield Environmental.
9. Samples will be analyzed in accordance with approved & standard test procedures to the best of our ability. Lockwood Laboratories, however, cannot be held responsible for the representativeness of the sample. In no event shall Lockwood Laboratories be held liable for the consequences of the data reported and its use, and shall be liable only for the monetary value of the tests.

Lockwood Laboratories

A Springfield Environmental Inc. Company

CHAIR OF
CUSTODY

1001 East St. P.O. Box 2728

Springfield, OH 45501-2728

Tel: (513) 324-8001

FAX: (513) 324-5185

CLIENT DASIAN ORIGINALS		PROJECT NAME Remediation Closure		SDWA				
ADDRESS 402 Jackson Street		SAMPLE LOCATION		NPDES				
CONTACT FRANK PUSEY		COLLECTED BY:		RCRA				
TELEPHONE		ANALYSIS REQUESTED		OTHER				
PO NUMBER				QUOTE				
SAMPLE ID #	METHOD	GR	COMP	SAMPLE TYPE	DATE	TIME	# OF BOTTLES	LAB USE ONLY LOG #
1A Closure	✓			Solid	4/26/96	7:30 PM	1	33770-999
1C "	✓							33771-999
2A "	✓							33772-999
2C "	✓							33773-999
3A "	✓							33774-999
3C "	✓							33775-999
COMMENTS: TOTAL LEAD SCHEDULE								
SAMPLE RELINQUISHED BY: Frank Pusy				SAMPLES RECEIVED BY: James E. Parish		DATE/TIME: 4/26/96 7:30 PM		REQUESTED DUE DATE
SAMPLE RELINQUISHED BY:				SAMPLES RECEIVED BY:		DATE/TIME:		RUSH: YES NO
SAMPLES RECEIVED IN LAB BY: J. Schmitt				TIME: 1355		DATE: 4/29/96		

TERMS & CONDITIONS

1. Minimum invoice amount is \$25.00
2. Payment terms are NET 30 Days with approved credit. A 2% discount is available for payments within 10 Days. Past due invoices are subject to a finance charge.
3. Submission of Chain of Custody and samples constitutes an agreement to perform the analysis and the client agrees to pay for any analyses completed prior to a notification "not to proceed".
4. Samples found to be "hazardous" will be returned to the client for disposal. Radioactive samples will not be accepted.
5. Complex samples may incur an additional prep charge. Client will be notified before lab proceeds.
6. The fee structure reflects our normal QC/QA protocol. Additional QC/QA will require a surcharge.
7. TURNAROUND TIME (TAT) is usually one week or less. Every effort will be made to accommodate RUSH samples. Additional charges, up to 100%, may be added depending on the time requirements. ADVANCE NOTIFICATION OF RUSH SAMPLES IS APPRECIATED!
8. Confidentiality of all data and customer information is strictly adhered to by Lockwood Laboratories and Springfield Environmental.
9. Samples will be analyzed in accordance with approved & standard test procedures to the best of our ability. Lockwood Laboratories, however, cannot be held responsible for the representativeness of the sample.
10. In no event shall Lockwood Laboratories be held liable for the consequences of the data reported and its use, and shall be liable only for the monetary value of the tests.

APPENDIX "F" CORRESPONDENCE



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

NOTICE OF DEFICIENCY

CERTIFIED MAIL

November 25, 1994

RE: CLOSURE PLAN
Design Original, Inc.
OHD 063 989 545

Design Original, Inc.
Attn. Mr. Frank Pusey
402 Jackson Street
Jackson Center, Ohio 45334-0813

Dear Mr. Pusey:

On May 11, 1994, Ohio EPA received from Design Original, Inc. a closure plan for a hazardous waste disposal area, an unpermitted disposal unit located at 402 Jackson Street, Jackson Center, Ohio.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Design Original Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule 3745-66-12. The public comment period extended from June 6, 1994 through July 15, 1994. No public comments were received by Ohio EPA.

Pursuant to OAC Rule 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.

Mr. Frank Pusey
Design Original, Inc.
Page Two

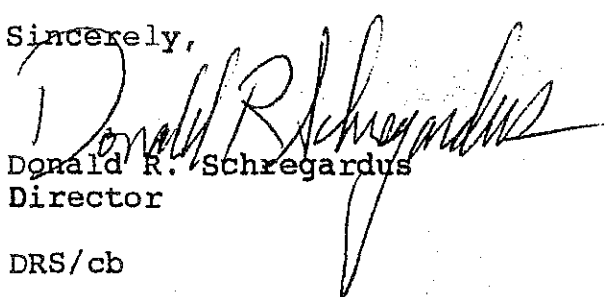
The modified closure plan shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck, but not obliterated.
2. New language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attention: Tom Crepeau, Data Management Section, P.O. Box 163669, Columbus, Ohio 43216-3669. A copy should also be sent to: Chris Budich, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, Ohio 45402.

Upon review of the resubmitted plan, I will prepare and issue a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Chris Budich at (513) 285-6094.

Sincerely,



Donald R. Schregardus
Director

DRS/cb

cc: Tom Crepeau, OEPA, DHWM Central File
Montee Suleiman, OEPA, DHWM
Harriet Croke, Ohio Permit Section, USEPA, Region V
Chris Budich, OEPA, Southwest District Office
George Momirov, Regency Environmental

ATTACHMENT A

DESIGN ORIGINAL, INC.
HAZARDOUS WASTE DISPOSAL AREA

OHD 063 989 545

SPECIFIC COMMENTS:

1. The closure plan must include a statement acknowledging the requirement for closure certification by both the owner\operator and an independent registered engineer licensed in Ohio pursuant to Ohio Administrative Code (OAC) section 3745-66-15. The owner\operator statement must include the exact wording found in OAC section 3745-50-42(D).
2. On page 1, section 1.3, the closure plan specifies the dimensions of the area to be closed as 20 feet long by 16 feet wide. On page 6 of the closure plan, the Remediation Site Plan, the area to be closed is shown to be 20 feet by 15 feet. Page 6 of the Remediation Site Plan also indicates that toluene was detected in samples D-4 and D-8 but this area is not included in the area to be closed. The closure plan does not explain how the boundaries for the contamination area were established. Design Originals, Inc. must provide additional information to adequately define the extent of contamination at the site. This information must be provided pursuant to OAC 3745-66-12.
3. On page 2, section 1.3, the closure plan states that concentrations of chrome and lead are nearly all within natural background ranges and would not be of concern in this remediation project. On page 19 of the closure plan, an excerpt from ERM-Midwest Inc.'s report of May 21, 1991, samples D-1 and D-5 were shown to have concentrations of lead and chromium, respectively, above background levels as established in "Background Levels of Heavy Metals in Ohio Farm Soils", 1983, Research Circular 275, Ohio State University, Wooster, Ohio which was used as a reference in the closure plan. Design Original shall revise the closure plan to address the clean-up standards for lead and chromium; either use Ohio Farm Soils which is 29 mg/kg for lead and 20 mg/kg for chromium, or establish on-site background standards. These levels of lead and chromium must be addressed in the closure plan pursuant to OAC 3745-66-12(B)(4).
4. On page 10, section 3.5 of the closure plan it states that "standard procedure" will be followed to decontaminate equipment used in the project. Design Original, Inc. must provide a detailed description of the decontamination steps

pursuant to OAC 3745-66-12(B)(4).

5. On pages 22-29 of the closure plan, laboratory results are provided for three samples collected July 28, 1993 and a trip blank. These results indicate the detection of methylene chloride, chlorobenzene, xylene, acetone, methyl isobutyl ketone, methyl ethyl ketone, and benzene. None of these organic constituents were detected in the trip blank. These constituents must be addressed in the closure plan pursuant to OAC 3745-66-12(B)(2).

END OF CLOSURE COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

George V. Voinovich
Governor

October 19, 1995

RE: DESIGN ORIGINAL
HAZARDOUS WASTE
SHELBY COUNTY
OHD 063 989 545

Mr. Frank Pusey, President
Design Originals, Inc.
402 Jackson Street
Jackson Center, Ohio 45334

Dear Mr. Pusey:

As discussed during our meeting at your facility on October 6, 1995, Design Original has yet to respond to Ohio EPA's Notice of Deficiency dated November 25, 1994 regarding the closure plan submitted May 11, 1994. Ohio EPA is aware that the consulting firm that wrote the plan is no longer in business. While Ohio EPA understands the difficulty this has caused Design Original in responding to the NOD, it is felt that Design Original has had a sufficient amount of time to contract the services of another environmental consultant to complete this project.

Given the situation and the concern you expressed during our meeting regarding your desire to resolve this issue, Ohio EPA is willing to grant an extension to the deadline for the submittal of your revised closure plan. However, this will be the final extension. If Design Original fails to submit a revised closure plan before December 1, 1995 this matter will be referred to Ohio EPA's Central Office for escalated enforcement.

Enclosed are copies from the 1994-1995 Dayton Area Ameritech Yellow Pages which include various environmental service firms. Ohio EPA hopes that this will assist you in your effort. Should you have any questions concerning the above, please contact me at (513) 285-6083.

Sincerely,

Christopher M. Budich
Division of Hazardous Waste Management

CMB/ms

Enclosure

cc: Montee Suleiman, CO, DHWM
Laurie Stevenson, CO, DHWM

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

1. ☒ Complete items 1 and/or 2 for additional services.
 2. ☒ Complete items 3, 4a, and 4b.
 3. ☒ Print your name and address on the reverse of this form so that we can return this card to you.
 4. ☒ Attach this form to the front of the mailpiece, or on the back if space does not permit.
 5. ☒ Write "Return Receipt Requested" on the mailpiece below the article number.
 6. ☒ The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:

Ohio EPA
 P.O. Box 163669
 Col. Ch 43216

4a. Article Number
 P434734121

4b. Service Type
☐ Registered
☐ Express Mail
☒ Certified
☐ Insured
☐ Return Receipt for Merchandise
☐ COD

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)
 X *Thos L. Brown*

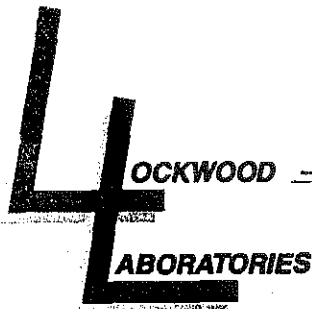
7. Date of Delivery
 DEC 3 1995

8. Addressee's Address (Only if requested and fee is paid)

9. Consult postmaster for fee.

I also wish to receive the following services (for an extra fee):
 1. ☐ Addressee's Address
 2. ☐ Restricted Delivery

12/1/95
 MAILED
 12/1/95



Committed to Providing Quality Analytical Services

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
ATTENTION: TOM CREPEAU, DATA MANAGEMENT SECTION
PO BOX 163669
COLUMBUS, OHIO 43216-3669

Dec. 1, 1995

Dear Sir:

This is the Closure Plan proposal for Design Original, Inc. in Jackson Center, Ohio. We have attempted to address all the concerns listed in the Notice of Deficiency received in November 1994. Each "Specific Item" is addressed in the text of the plan.

If you should have any questions or wish to discuss this plan, please call me at your convenience.

Sincerely,


James E. Parrish, Environmental Engineer

IMPORTANT MESSAGE

FOR Jim TIME 1:10 P.M.
DATE 3/27

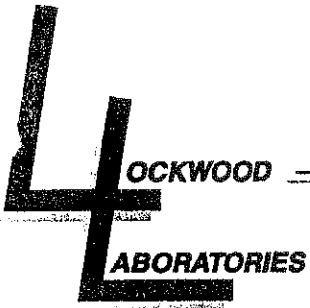
M/L Chris Budich
OF OEPA

PHONE AREA CODE NUMBER EXTENSION
Q FAX AREA CODE NUMBER TIME TO CALL
Q MOBILE AREA CODE NUMBER TIME TO CALL

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE Jim, Chris said to plan for Jackson Center is in Columbus, but you can start any time, he doesn't see any problems

SIGNED Patrick



Committed to Providing Quality Analytical Services

April 24, 1996

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
SOUTHWEST DISTRICT OFFICE
401 E. FIFTH STREET
DAYTON, OHIO 45402-2911

ATT: CHRISTOPHER M. BUDICH

Dear Chris,

We have scheduled the remediation of the Design Original facility in Jackson Center, Ohio to begin on Friday April 26, 1996. We will adhere to the Remediation Plan dated November 30, 1996. I plan to fill several roll-off units with the removed soil and test composite samples from each one for TCLP metals, volatiles and semi-volatiles to determine final disposition of each.

Should you have any questions or wish to discuss the plan, please call me at your convenience.

Sincerely,

James E. Parrish, Environmental Engineer

- ## SITE SAFETY PLAN ACKNOWLEDGMENT FORM

8



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43210-1049**CLOSURE PLAN APPROVAL****CERTIFIED MAIL**Re: **CLOSURE PLAN APPROVAL**
DESIGN ORIGINAL
OHD063989545

May 10, 1996

To: Jim Parrish
*From: Frank Pusey*Mr. Frank Pusey, Owner
Design Original, Inc.
402 Jackson Street
Jackson Center, Ohio 45334-0813

Dear Mr. Pusey:

On May 11, 1994, Design Original, Inc. submitted to Ohio EPA a closure plan for a Hazardous waste disposal area, an unpermitted storage unit located at 402 Jackson Street, Jackson Center, Ohio. Revisions to the closure plan were submitted on December 7, 1995 and December 19, 1995. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Design Original, Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Design Original, Inc. in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of Design Original, Inc.'s submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at 402 Jackson Street, Jackson Center, Ohio meets the performance standard contained in OAC 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The revised closure plan submitted to Ohio EPA on December 19, 1995 by Design Original, Inc. is hereby approved.

Please be advised that approval of this closure plan does not release Design Original, Inc. from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective actions for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Kara Yoder Date 5/10/96

OHIO E.P.A.

MAY 10 96

ENTERED DIRECTOR'S JOURNAL

George V. Volnovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

Closure Plan Approval
Design Original
Page 2

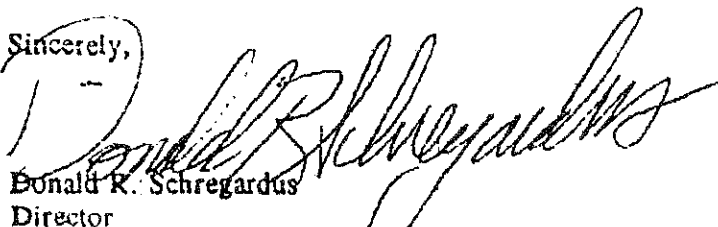
Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages; to undertake any removal, remedial, and/or response action relating to the facility; and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42(D), and should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attention: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049.

Sincerely,


Donald R. Schregardus
Director

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Kara Yohn

Date 5/10/96

cc: Tom Crepeau, OEPA, DHWM Central File
Montee Suleiman, OEPA, DHWM, CO
Harriet Croke, Ohio Permit Section, USEPA, Region V
Harold O'Connell, OEPA, Southwest District Office
James Parrish, Springfield Environmental, Inc.

OHIO E.P.A.

MAY 10 96

ENTERED DIRECTOR'S JOURNAL

IMPORTANT MESSAGE

FOR Jim

DATE 5/13/96 TIME 9:30 A.M. / P.M.

M Chairs Bought

OF EPA

PHONE AREA CODE NUMBER EXTENSION

☐ FAX

☐ MOBILE AREA CODE NUMBER TIME TO CALL

TELEPHONED PLEASE CALL

CAME TO SEE YOU WILL CALL AGAIN

WANTS TO SEE YOU PUSH

RETURNED YOUR CALL SPECIAL ATTENTION

MESSAGE Des on status?

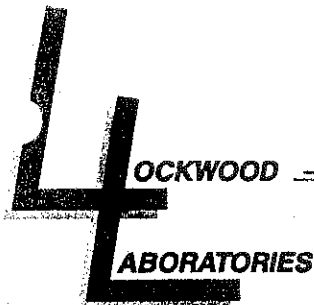
SIGNED

TOPS FORM 3002S
LITHO IN U.S.A.

as TOLUENE WASTE.

TEC NO GOOD

NEED TO VALS



Certificate of Analysis

ATTN CHRISTOPHER M BUDICH
OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT
SOUTHWEST DISTRICT OFFICE
401 E FIFTH ST
DAYTON OH 45402-2911

May 15, 1996

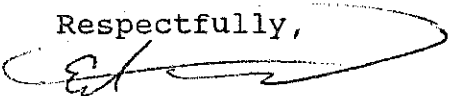
Re: Design Originals
Jackson Center, Ohio

Dear Chris,

Springfield Environmental, Inc. has conducted a soil remediation on a print shop VOC mixture located at Design Originals, Jackson Center, Ohio. Per the approved Closure Plan, the soil that had been excavated for disposal, was analyzed for TCLP Volatiles. Recently, you had a telephone conversation with Jim Parrish of Springfield Environmental, Inc. and indicated that you would like to see the analytical results for Total Volatiles. I have analyzed the sample retains, from the Design Original roll-offs, for Total Volatile Organic Compounds (SW846-8240). All results were below detection, with the exception of Box #6, which contained 300 ug/kg of Toluene. Box #6 has been previously moved off site. Since the remaining Boxes do not have any detectable amounts of VOC, I would like clearance to send the Boxes to Cherokee Run Landfill.

If you need any additional information about the attached analytical results, please call me at 1-800-308-8001.

Respectfully,



Ed Lockwood Jr.
President

Low closure report
I include PARAGRAPH
ABOUT MISCOMMUNICATION
AND HAZ WASTE GOING
TO Cherokee Run by
MISTAKE.

PER . JED
CHRIS
5/21/96

JAN-10-96 WED 9:26 PM

201 E. Columbus Ave.
P.O. Box 338
Bellefontaine, Ohio 43311
513-699-6161

2



January 10, 1996

Ohio EPA
Attn: Chris Budich
Southwest Office

Dear Mr. Budich:

This letter is to inform you that Frank Pusey of Design Original in Jackson Center, Ohio is a customer of American Community Bank, N.A. After a conversation with Mr. Pusey about a current cleanup project, I feel he has resources thru this bank to cover the cost of the project.

Sincerely,

A handwritten signature in cursive script that reads "Jon L. Williman".

Jon L. Williman
Assistant Vice President
Commercial Loan Officer

2.0 SITE SAFETY AND SECURITY

2.1 SITE SAFETY PLAN

A) GENERAL INFORMATION

SITE: Design Original, Incorporated

ADDRESS: 402 Jackson Street
Jackson Center, Ohio 45334-0813

PREPARED BY: James E. Parrish, Environmental Engineer
Lockwood Laboratories / Springfield Environmental, Inc.
P. O. Box 2728
1001 East Street
Springfield, Ohio 45501-2728

OVERALL HAZARD: SERIOUS _____ MODERATE _____
LOW XXX UNKNOWN _____

SITE DESCRIPTION: Relatively level terrain with no overhead obstruction and only minor underground obstructions (sanitary sewer tile).

B) SITE WASTE CHARACTERISTICS

WASTE TYPE: Contaminated soil (silk screen ink cleaning solvents)

C) HAZARD EVALUATION

Site hazards were extremely low. There were neither underground nor overhead electrical lines, no chemical hazards nor any mechanical hazards associated with this closure.
There were no incidents during the remediation process.

D) SITE SAFETY WORK PLAN

The Site Safety Plan was implemented without incident.

SITE SECURED: YES, the site was secured with yellow caution tape limiting access to the remediation workers. No smoking or open flame was permitted.

PERSONAL PROTECTION: Level "D": Tyvek oversuit with gloves. No breathing protection was required because of the low concentrations of contaminants.

MODIFICATIONS: None required.

ACTIONS: None required.

SPECIAL EQUIPMENT FACILITIES PROCEDURES: None.

SITE ENTRY: Restricted to those who signed the Site Safety Plan.

WORK LIMITATIONS: Field work was completed in one day.

CLOSURE DERIVED WASTES: All equipment was hosed down at the site. All liquid wastes and contaminated wash water were pumped into a 55 gallon drum and removed from the site by LL / SEI personnel.

EMERGENCY INFORMATION:

PROJECT MANAGER: James E. Parrish, Lockwood Labs (513)324-8001

FACILITY OWNER: Frank Pusey, Design Original, Inc. (513)596-5121

PROJECT TECHNICIAN: Fred Fitzsimmons, Lockwood Labs (513)324-8001

FIRE: Jackson Center Fire Department 911

POLICE: Jackson Center PD 911
Shelby County Sheriff (513)498-1111

HOSPITAL: Wilson Memorial (Sidney) (513)492-7296

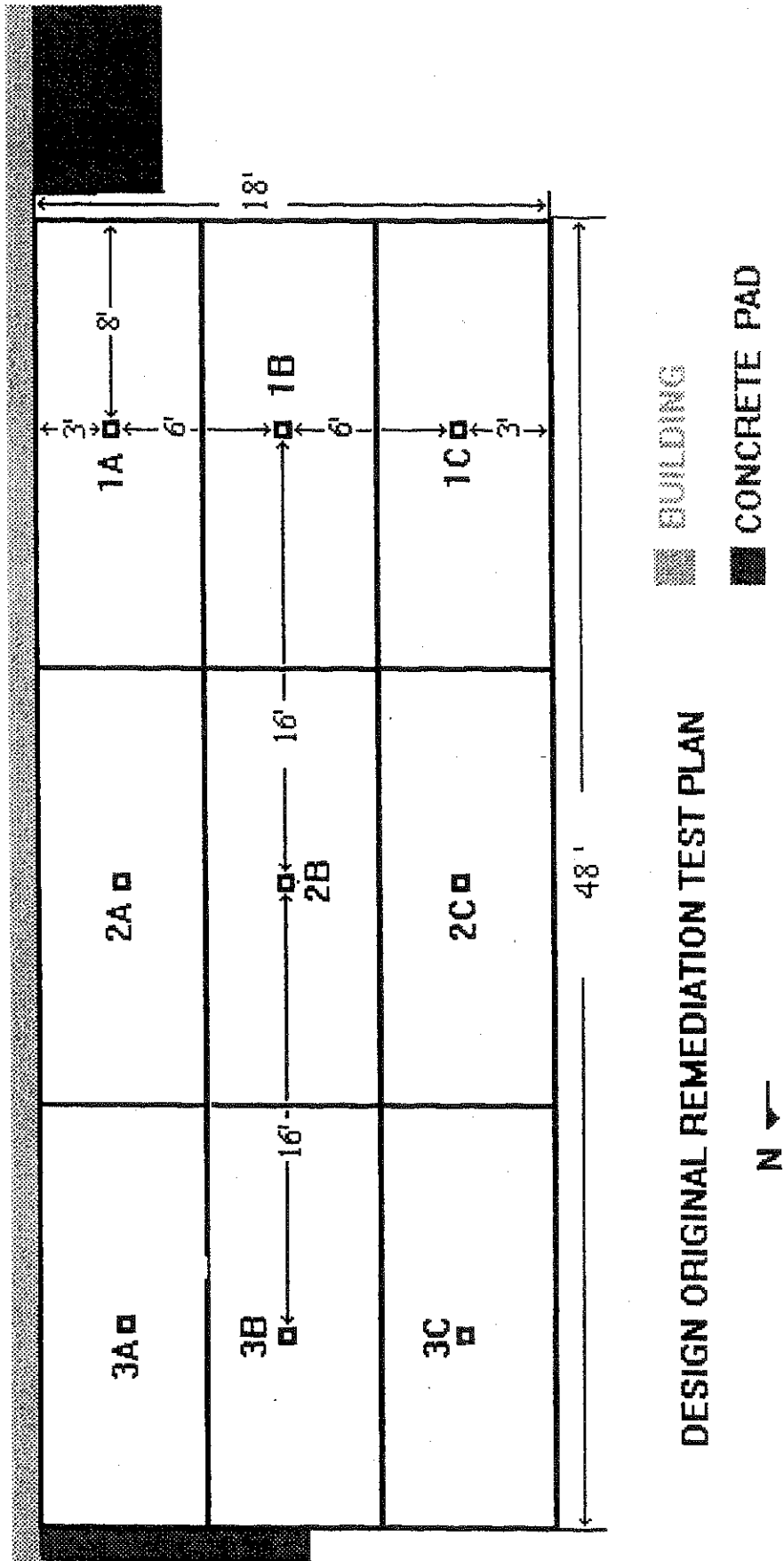
OHIO EPA, SW District: Chris Budich, SW District Office (513)285-6357

This Site safety and Security Plan was read and signed by the following on April 26, 1996:

James E. Parrish, Springfield Environmental Inc.	Project Manager
Fred Fitzsimmons, Springfield Environmental Inc.	Project Technician
Frank Pusey, Design Original, Inc.	Owner
Hank Stonerook, GBS Environmental	P.E.
L. Chiles, Charlie Williams Excavating,	Equipment Operator

A copy of the signed log is presented in Appendix "F".

FIGURE 3



DESIGN ORIGINAL REMEDIATION TEST PLAN

LOCKWOOD

LABORATORIES

Committed to Providing Quality Analytical Services

RAY HARRIS
LAIDLAW WASTE SYSTEMS
400 S TECUMSEH ROAD
SPRINGFIELD OH 45506

May 17, 1996

Dear Ray,

I delivered the Design Original laboratory reports to Chris Budich of the Ohio EPA Southwest District Office. Chris acknowledged that Design Originals was not given a Notice of Determination stating that the waste soil was F005 and that he did not pick up on the fact we were not treating it as a listed waste, as the Agency desired, until it was too late. Chris will be sending a letter to Design Originals explaining that a miscommunication had occurred and what actions must happen. Chris explained that while he could not guarantee there would not be a problem from Columbus, it would be Southwest District Office's recommendation, to Columbus, to take no action and close the file.

Furthermore, Chris verbally approved the remaining two roll-offs going to Bellefontaine for disposal. If you would like to speak with Chris on the situation, his number is 513-285-6094.

Respectfully,



Ed Lockwood Jr.
President

APPENDIX "G" PHOTOGRAPHS TAKEN DURING EXCAVATION

List of Photos
Soil Remediation - Design Original
Jackson Center, Ohio



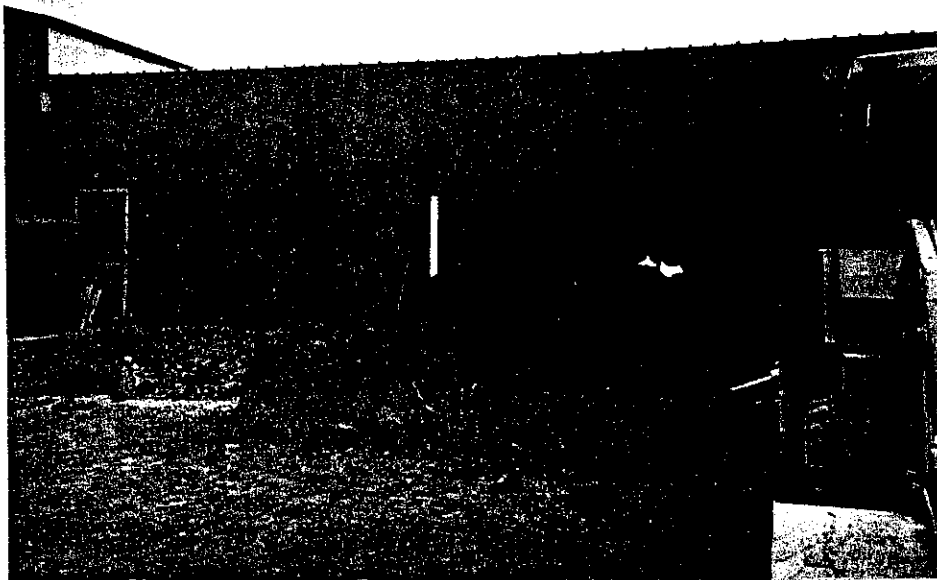
1. Design Original - pre remediation.
Area of remediation is in vicinity of the backhoe. April 26, 1996



2. Beginning excavation.
April 26, 1996



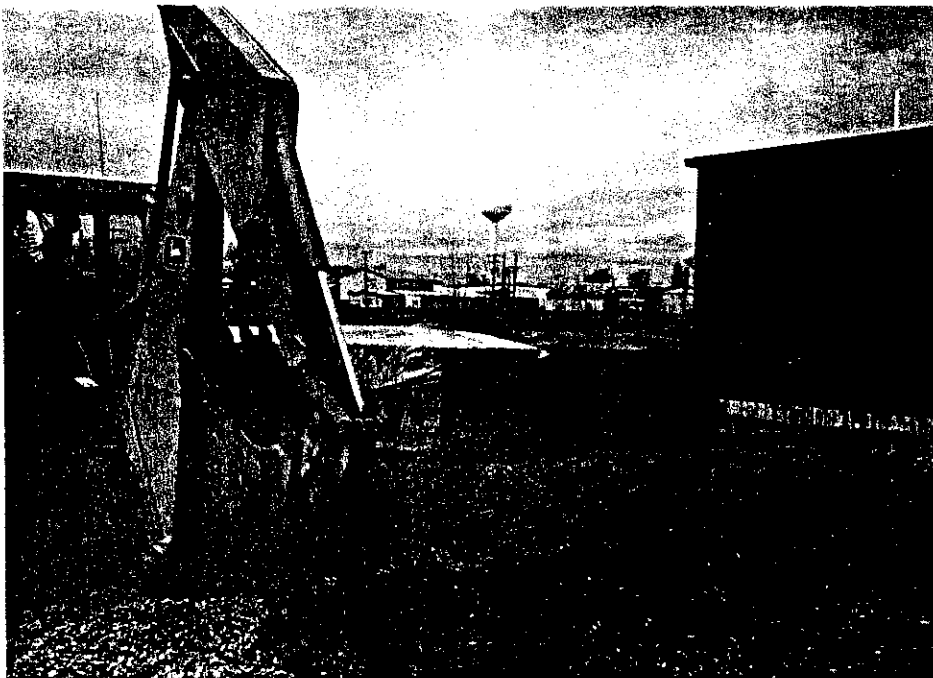
3. Excavation at Design Original. Note depth of gravel. Sanitary sewer line clean out is white stickup. April 26, 1996



4. Excavation of soil at Design Original. Soil stayed on ground before being placed in lined roll off boxes. April 26, 1996



5. Arrival of two more roll off boxes.
Boxes were lined prior to placement of soil. April 26, 1996



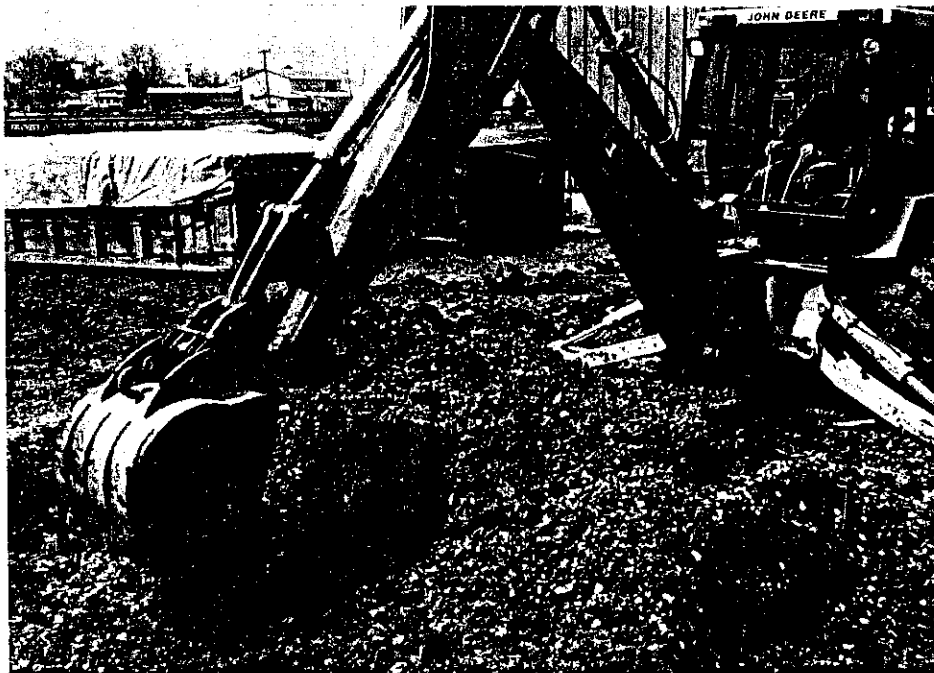
6. Completed excavation near north addition to building.
Note covered roll off box. April 26, 1996



7. Excavation in area of sewer line.
April 26, 1996



8. Sewer line excavated to depth (and ruptured) by backhoe.
April 26, 1996



9. Continues excavation in area of sewer line.
April 26, 1996



10. Sewer line eventually removed and excavation continued until approximately
8 - 9 feet deep in this location . April 26, 1996

APPENDIX "H " WASTE DISPOSAL MANIFESTS



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

General & Soil

F. PHYSICAL CHARACTERISTICS OF WASTE (See Instructions)

1. Color	2. Does the waste have a strong incidental odor? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes; if so, describe: _____	3. Physical State @ 70°F/21°C: <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Semi-Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Other: _____	4. Layers <input checked="" type="checkbox"/> Multi-layered <input type="checkbox"/> Bi-layered <input type="checkbox"/> Single Phased	5. Specific Gravity Range <u>2.0-3.0</u>	6. Free Liquids: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Volume: _____
7. pH: <input type="checkbox"/> ≤2 <input type="checkbox"/> >2-4 <input type="checkbox"/> 4-7 <input type="checkbox"/> 7 <input type="checkbox"/> 7-10 <input type="checkbox"/> 10- <12.5 <input type="checkbox"/> ≥12.5 <input type="checkbox"/> Range <input type="checkbox"/> NA					
8. Flash Point: <input type="checkbox"/> None <input type="checkbox"/> <140°F/60°C <input type="checkbox"/> 140 - 199°F/60 - 93°C <input checked="" type="checkbox"/> ≥200°F/93°C <input type="checkbox"/> Closed Cup <input type="checkbox"/> Open Cup					

G. CHEMICAL COMPOSITION

See info already
fixed.

	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
Total:	%

2. Does the waste contain any of the following?
(provide concentration if known).

	NO	or	LESS THAN	or	ACTUAL
PCBs	<input checked="" type="checkbox"/>		<input type="checkbox"/> < 50 ppm		_____ ppm
Cyanides	<input checked="" type="checkbox"/>		<input type="checkbox"/> < 30 ppm		_____ ppm
Sulfides	<input checked="" type="checkbox"/>		<input type="checkbox"/> < 500 ppm		_____ ppm

Please note Unless analytical results are attached, the chemical composition identification should include, at a minimum, Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver, Pesticides, Herbicides, and any other TCLP constituents that may be present in the waste. The total composition must be greater than or equal to 100%. (0001% = 1 ppm or 1 mg/l)

3. Indicate method used to determine composition (if provided): ☐ TCLP ☐ Total ☐ Other: Boll

H. SAMPLING SOURCE (e.g., Drum, Lagoon, Pit, Pond, Tank, Vat)

roll off 5

1. REPRESENTATIVE SAMPLE CERTIFICATION

1. Print Sampler's Name: JAMES PARNISH 2. Sample Date: April 26, 1996
3. Sampler's Title: ENVIRONMENTAL ENGINEER
4. Sampler's Employer (if other than Generator): Springfield Environmental Inc
The sampler's signature certifies that any sample submitted is representative of the waste described above pursuant to 40 CFR 261.20(c) or equivalent rules.
5. Sampler's Signature: James E. Parnish

J. GENERATOR CERTIFICATION

By signing this profile sheet, the Generator certifies:

1. This waste is not a "Hazardous Waste" as defined by USEPA or Canadian Federal regulation and/or the state/province.
2. This waste does not contain regulated radioactive materials or regulated concentrations of PCB's (Polychlorinated Biphenyls).
3. The unshaded portions of this sheet and the attachments contain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the Generator has been disclosed.
4. The Generator has read and understands the Contractor's Definition of Special Waste included in Part B.5. of the attached instructions form. All types and amounts of special wastes provided in incidental amounts have been identified in section B.6. of this form.
5. The analytical data presented herein or attached hereto were derived from testing a representative sample taken in accordance with 40 CFR 261.20(c) or equivalent rules.
6. If any changes occur in the character of the waste, the Generator shall notify the Contractor prior to providing the waste to the Contractor.

7. Signature James E. Parikh for Frank Rosey 8. Title Owner
9. Name (Type or Print) JAMES E. PARIKH 10. Date 5/24/96



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

General & Sol.

F. PHYSICAL CHARACTERISTICS OF WASTE (See Instructions)

1. Color	2. Does the waste have a strong incidental odor? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes; if so, describe: _____	3. Physical State @ 70°F/21°C: <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Semi-Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Other: _____	4. Layers <input checked="" type="checkbox"/> Multi-layered <input type="checkbox"/> Bi-layered <input type="checkbox"/> Single Phased	5. Specific Gravity Range <u>2.0-3.0</u>	6. Free Liquids: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Volume: _____
7. pH: <input type="checkbox"/> S2 <input type="checkbox"/> > 2-4 <input type="checkbox"/> 4-7 <input type="checkbox"/> 7 <input type="checkbox"/> 7-10 <input type="checkbox"/> 10- <12.5 <input type="checkbox"/> ≥12.5 <input type="checkbox"/> Range <input type="checkbox"/> N/A					
8. Flash Point: <input type="checkbox"/> None <input type="checkbox"/> <140°F/60°C <input type="checkbox"/> 140 - 199°F/60 - 93°C <input checked="" type="checkbox"/> ≥200°F/93°C <input type="checkbox"/> Closed Cup <input type="checkbox"/> Open Cup					

4. CHEMICAL COMPOSITION

<u>See info already</u>	_____ %	2. Does the waste contain any of the following:		
<u>fixed.</u>	_____ %	(provide concentration if known).		
_____	_____ %		NO or LESS THAN or ACTUAL	
_____	_____ %	PCBs	<input checked="" type="checkbox"/>	<input type="checkbox"/> < 50 ppm _____ ppm
_____	_____ %	Cyanides	<input checked="" type="checkbox"/>	<input type="checkbox"/> < 30 ppm _____ ppm
_____	_____ %	Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> < 500 ppm _____ ppm
_____	_____ %			
_____	_____ %			
_____	_____ %			
_____	_____ %			
Total:	_____ %			

Please note: Unless analytical results are attached, the chemical composition identification should include, at a minimum, Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver, Pesticides, Herbicides, and any other TCLP constituents that may be present in the waste. The total composition must be greater than or equal to 100%. (0001% = 1 ppm or 1 mg/l)

3. Indicate method used to determine composition (if provided): ☐ TCLP ☐ Total ☐ Other: Both

H. SAMPLING SOURCE (e.g., Drum, Lagoon, Pit, Pond, Tank, Vat) ROV OHS

I. REPRESENTATIVE SAMPLE CERTIFICATION

1. Print Sampler's Name: JAMES PARRISH 2. Sample Date: April 26, 1996
3. Sampler's Title: ENVIRONMENTAL ENGINEER
4. Sampler's Employer (if other than Generator): Springfield Environmental Inc.
The sampler's signature certifies that any sample submitted is representative of the waste described above pursuant to 40 CFR 261.20(c) or equivalent rules.
5. Sampler's Signature: James E. Parrish

J. GENERATOR CERTIFICATION

By signing this profile sheet, the Generator certifies:

1. This waste is not a "Hazardous Waste" as defined by USEPA or Canadian Federal regulation and/or the state/province
2. This waste does not contain regulated radioactive materials or regulated concentrations of PCB's (Polychlorinated Biphenyls).
3. The unshaded portions of this sheet and the attachments contain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the Generator has been disclosed
4. The Generator has read and understands the Contractor's Definition of Special Waste included in Part B.5. of the attached instructions form. All types and amounts of special wastes provided in incidental amounts have been identified in section B 6. of this form.
5. The analytical data presented herein or attached hereto were derived from testing a representative sample taken in accordance with 40 CFR 261.20(c) or equivalent rules.
6. If any changes occur in the character of the waste, the Generator shall notify the Contractor prior to providing the waste to the Contractor

7. Signature James E. Parrish for Frank Rosey Title Owner
9. Name (Type or Print) JAMES E. PARRISH 10. Date 5/24/96

LAIDLAW

WASTE SYSTEMS

CHEROKEE
BELL

Post-It® Fax Note 7671

Date	6-20-96	Pages	6
To	TIM PARRISH		
From	NORM YANTIS		
Co./Dept.	SPRINGFIELD ENV.		
City	A. W. T.		
Phone #	663-5506		
Fax #	513-324-5185		
Fax #	663-5598		

NON-HAZARDOUS SPECIAL WASTE MANIFEST**GENERATOR**

SPECIAL WASTE ACCEPTANCE APPLICATION NO.

83203

GENERATOR NAME**GENERATOR LOCATION**ADDRESS Springfield Env.
1001 East Street
Springfield, OHADDRESS 402 Jackson Street
Jackson Center, OH

PHONE NO. 513-324-8001

PHONE NO.

EMERGENCY PHONE 513-324-8001

DESCRIPTION OF WASTE

contaminated soil

QUANTITY

20 yd

UNITS

1

I hereby certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law, is not hazardous or medical waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified, and packaged, and is in proper condition for transportation according to applicable regulations.

James E. Parrish

Generator Authorized Agent Name

for James E. Parrish

Signature

TRANSPORTER

TRUCK NO. 18

PHONE NO. 513-663-5506

TRANSPORTER NAME**DRIVER NAME (print)**ADDRESS A.W.T. Transfer
Services, Inc.
346 N. St. Rt. 235
St. Paris, OH 43072

Vernon Peacock

VEHICLE LICENSE NO/STATE

VEHICLE CERTIFICATION

I hereby certify that the above material was picked up at the generator site listed above.

Driver Signature

Date

Vernon Peacock 5-10-96

I hereby certify that the above named material was delivered without incident to the destination listed below.

Driver Signature

Date

Vernon Peacock 5-10-96

DESTINATION

CHEROKEE RUN LANDFILL
2046 U.S. Rte. 98 North
Bellefontaine, Logan County, Ohio 43111
(513) 602-3608

Authorized Agent (print)

Agent Signature

Date

Don Don Don

5/10/96



WASTE SYSTEMS

CHEROKEE RUN LANDFILL
BELLEFONTAINE, OHIO

NON-HAZARDOUS SPECIAL WASTE MANIFEST

GENERATOR

SPECIAL WASTE ACCEPTANCE APPLICATION NO. 83203

GENERATOR NAME

GENERATOR LOCATION

ADDRESS Springfield Env.
1001 East Street
Springfield, OH

ADDRESS

402 Jackson Street
Jackson Center, OH

PHONE NO. 513-324-8001

PHONE NO.

EMERGENCY PHONE

513-324-8001

DESCRIPTION OF WASTE

contaminated soil

QUANTITY

20 yd

UNITS

1

I hereby certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law, is not hazardous or medical waste as defined by 40 CFR Part 281 or any applicable state law, has been properly described, classified, and packaged, and is in proper condition for transportation according to applicable regulations.

James E. Parrish
Generator Authorized Agent NameFor James E. Parrish
James E. Parrish
Signature

TRANSPORTER

TRUCK NO. 18

PHONE NO. 513-663-5506

TRANSPORTER NAME

DRIVER NAME (print)

ADDRESS A.W.T. Transfer
Services, Inc.
346 N. St. RT. 235
St. Paris, OH 43072

Vernon Peacock

VEHICLE LICENSE NO./STATE

VEHICLE CERTIFICATION

I hereby certify that the above material was picked up at the generator site listed above

Driver Signature

Date

I hereby certify that the above named material was delivered without incident to the destination listed below

Driver Signature

Date

DESTINATION

CHEROKEE RUN LANDFILL
2946 U.S. Rte. 68 North
Bellefontaine, Logan County, Ohio 43111
(513) 893-3555

Authorized Agent (print)

Agent Signature

Date



WASTE SYSTEMS

CHEROKEE RUN LANDFILL
BELLEFONTAINE, OHIO

NON-HAZARDOUS SPECIAL WASTE MANIFEST

GENERATOR

SPECIAL WASTE ACCEPTANCE APPLICATION NO. 87203

GENERATOR NAME

GENERATOR LOCATION

ADDRESS Springfield Env.
1001 East Street
Springfield, OH

ADDRESS

402 Jackson Street
Jackson Center, OH

PHONE NO. 513-324-8001

PHONE NO.

EMERGENCY PHONE 513-324-8001

DESCRIPTION OF WASTE

QUANTITY

UNITS

contaminated soil

20 yd

1

I hereby certify that the above named material does not contain free liquid as defined by 40 CFR Part 260.10 or any applicable state law, is not hazardous or medical waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified, and packaged, and is in proper condition for transportation according to applicable regulations.

James E. Parrish

Generator Authorized Agent Name

For James E. Parrish

 AWT
Signature

TRANSPORTER

TRUCK NO. 18

PHONE NO. 513-663-5506

TRANSPORTER NAME

DRIVER NAME (print)

ADDRESS A.W.T. Transfer
Services, Inc.
346 N. ST. RT. 235
Saint Paris, OH

Vernon Peacock

VEHICLE LICENSE NO./STATE

VEHICLE CERTIFICATION

I hereby certify that the above material was picked up at the generator identified above.

 5-11-96
Driver Signature Date

I hereby certify that the above named material was delivered without incident to the destination listed below.

 5-11-96
Driver Signature Date

DESTINATION

CHEROKEE RUN LANDFILL
2946 U.S. Rte. 68 North
Bellefontaine, Logan County, Ohio 43111
(513) 593-3585

 AWT
Authorized Agent (print)

 5/11/96
Agent Signature

Date



WASTE SYSTEMS

CHEROKEE RUN LANDFILL
BELLEFONTAINE, OHIO

NON-HAZARDOUS SPECIAL WASTE MANIFEST

GENERATOR

SPECIAL WASTE ACCEPTANCE APPLICATION NO.

83203

GENERATOR NAME

GENERATOR LOCATION

ADDRESS

SPRINGFIELD ENV.
1001 EAST STREET
SPRINGFIELD, OH

ADDRESS

402 JACKSON ST.
JACKSON CENTER, OH

PHONE NO.

513-324-8001

PHONE NO.

513-324-8001

EMERGENCY PHONE

DESCRIPTION OF WASTE

CONTAMINATED SOIL

QUANTITY

20 YD.

UNITS

1

I hereby certify that the above named material does not contain free liquid as defined by 40 CFR Part 280.10 or any applicable state law, is not hazardous or medical waste as defined by 40 CFR Part 281 or any applicable state law, has been properly described, classified, and packaged, and is in proper condition for transportation according to applicable regulations.

JAMES E. PARISH

Generator Authorized Agent Name

FOR JAMES E. PARISH

Norman E. Yantis

Signature

TRANSPORTER

TRUCK NO.

PHONE NO.

513-663-5500

TRANSPORTER NAME

DRIVER NAME (print)

ADDRESS

AWT TRANSFER
SERVICES, INC.

VEHICLE LICENSE NO./STATE

346 N.S.R. 235
ST. PARIS, OH

VEHICLE CERTIFICATION

I hereby certify that the above material was picked up at the generator site listed above.

Driver Signature

Date

5-11-96

I hereby certify that the above named material was delivered without incident to the destination listed below.

Driver Signature

Date

Norman E. Yantis 5-11-96

DESTINATION

CHEROKEE RUN LANDFILL
2948 U.S. Rte. 68 North
Bellefontaine, Logan County, Ohio 43111
(513) 523-3568

Authorized Agent (print)

Agent Signature

Date

Charlene Kennedy 5/11/96

Original No. negotiable

STRAIGHT BILL OF LADING

A.M.T. Transfer Services, Inc.

(Notes of English)

Strongly disagree

Call number: 231962

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of the Bill of Lading
at Jackson Center, Ohio May 31 19 96

FROM Springfield Environmental, Inc.

[illegible]

Shoppers hereby certify that he is honest with all the terms and conditions of this said bill of lading, including those on the back thereof, not only in the foregoing statement as well as in the governing the said bill of lading, and the said terms and conditions are hereby agreed by the shippers and accepted for benefit and to the benefit of the consignee of this shipment.

Consigned to Stoney Hollow Landfill

PH: 513-267-5105 (SUGAN)

(Mail or street address of consumer for purposes of notification)

Destination 2460 S. Cettysburg State OH Zip County

Delivery Address *

* To be filled in only when shipper desires and government health provide for delivery time

Route

Delivering Carrier A.W.T. Transfer Services, Inc.

Car or Vehicle Initials

18

Page NO - 3

Na
fackana

Kind of Package, Description of Articles
Shipped, Marks and Specifications

WEIGHT
(Subjects in
Connections)

Class
of Boat

Check
Column

1 20 cu yd roll-off container
contaminated soil

PROFILE NUMBER 416798

FOR JIM PARRISH

Norman C. Harris

Paul K. Rogers 5-31-96

the value depends on the degree of depreciation applied to the property, that the 1981 Act shall state whether it is carried on in the United Kingdom.¹ We see the value depends on whether depreciation is applied to the ship, the ship wearing the registered name of the ship, or the ship in actual service of the property is hereby "specifically required by the statute to be not exceeding

1. The above information is being furnished to you for your information only. It is not intended to be used for any other purpose.

Springfield Environmental Shingler, Per Jim Parrish

Agent, Per Norm Yantis
Vern Peacock

செய்துள்ளதற்கு முன் எந்தவிதமான அங்கீகாரம் அளிக்கப்படவில்லை.

Wilson Jones

Carbonless Snap-A-Way® Forms
ACCO USA, Inc. Made in U.S.A.

44-301 - Triplicate
44-302 - Unavailable

Original Not Negotiable

STRAIGHT BILL OF LADING

A. T. Transfer Services, Inc.

(Name of Insurer)

Simplicial sets

Cardinal's No. 531961

RECEIVED, subject to the classifications and facsimile in effect on the date of the issue of this Bill of Lading.

Jackson Center, Ohio May 31 19 96

From Springfield Environmental, Inc

[illegible]

Shippers hereby certifying that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of the shipment of said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to Stoney Hollow Landfill

PH: 513-267-5105 (SUSAN)

listed or street address of company. For purposes of notification, a

2460 S. Gettysburg State OH Zip County

Delivery Address *

* To be filled in only when shipper desires and guaranteeing to the provide for defense, the

1948

Delivering Carrier A.W.T. Transfer Services, Inc.

Car or Vehicle Initials 18

No. R0-3

No Package	Kind of Package, Description of Articles, Special Markings, and Particulars	Weight (Subject to Correction)	Class or Rate	Check Customs
1	20 cu yd roll-off container contaminated soil PROFILE NUMBER 416798 FOR JIM. PARRISH. Norman E. Gantis A.W.T. Paul R. Kinnegan			

Subject to the above, the CMA conditions of carriage shall be deemed to be incorporated in the contract of carriage, and the responsibility for the payment of the charges shall be borne by the cargo owner, subject to the following conditions:

The carrier shall not make delivery of the goods without payment of freight and other charges.

It has been suggested that the use of a single word to describe a complex phenomenon is a simplification of the truth.

(c) *Effect of the change in the number of the charges on the electric field*

References

(The signature is a handwritten copy of the name prepared.)

Charges Advanced:

9. The W distribution of $\hat{\theta}_1$ is: $\hat{\theta}_1 \sim N(\theta_1, \sigma^2/n)$. The log-likelihood function is: $\ell(\theta_1) = -\frac{n}{2} \log \sigma^2 - \frac{n}{2} \left(\frac{\hat{\theta}_1 - \theta_1}{\sigma} \right)^2$. The log-likelihood function is: $\ell(\theta_1) = -\frac{n}{2} \log \sigma^2 - \frac{n}{2} \left(\frac{\hat{\theta}_1 - \theta_1}{\sigma} \right)^2$.

1. Disruption & removal of trees of standing crop

¹ See, e.g., *United States v. Gurnea*, 199 F.3d 1005, 1010 (9th Cir. 2000).

Springfield Environmental Shipper, Per Jim Parrish

Agent, Per Norm Yantis
Yern Peacock

² *ഭാരതത്തിലെ പാവപ്പെട്ട നല്ല കഥകളുടെ ഒരു ശേഖരം.*

Wilson Jones

Carbonless Snap-A-Way® Forms
ACCO USA, Inc. Made in U.S.A.

44-301 - Triplicate
44-302 - Quadruplicate

**C.2 Compliance/
Enforcement**



State of Ohio Environmental Protection Agency

Southwest District Office

South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6404

George V. Voinovich
Governor

December 15, 1993

Mr. Frank Pusey
President, Design Originals, Inc.
402 Jackson St
Jackson Center, OH 45334

DESIGN ORIGINALS
SHELBY CO
HAZARDOUS WASTE
OHD0639895545
EXEMPT SQG-TSD-LDF

Dear Mr. Pusey:

On Tuesday, December 7, 1993, Chris Cosgrave, Mark Metcalf and I inspected Design Originals, Inc., to determine compliance with current hazardous waste management regulations. Mr. Dan Faulder showed us around the facility.

Based on our inspection, Design Originals appears to be a non-generator of hazardous waste due to changes which have been made in the types of products used. Until closure of the waste disposal area is certified, however, the company is still considered a land disposal facility, and continues to be in violation of Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-47, which pertain to financial assurance requirements that land disposal facilities must meet.

OEPA continues to await submission of a closure plan that meets performance standards per OAC 3745-66-12. During a recent conference call with Brad Schneider and George Momirov, problems noted with the proposed closure plan submitted in May of 1993 were discussed, and a formal plan incorporating necessary changes was to be submitted shortly. To date, no plan has been received.

Please call if you have any questions.

Sincerely,

Chris Cotton
Division of Hazardous Waste Management



RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: Design Original, Inc
USEPA I.D.: OHD 063989545 HWFB No.: _____
Street: 402 Jackson St
City: Jackson Center State: OH zip: 45334
County: Shelby Telephone: (513) 596 5121
Owner/Operator: Frank Rusev, President
Street: 402 Jackson St PO Box 357
City: Jackson Center State: OH zip: 45334
Telephone: (513) 596 5121

Inspection Date: 5/29/91 Time: 1400 - 1415

Advance notice of inspection given? (yes) _____ (no) ☒
If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Chris Cotton</u>	<u>OEPA/SWDO Env Spec II</u>	<u>513 285 6357</u>

Facility Representative: Don Fowler

STATUS *

Cond. Exempt SQG _____ SQG _____ Large Quantity Generator _____
LDR Checklist Attached: (yes) _____ (no) ☒

ACTIVITIES

Containers _____	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

* Design Original, Inc. was regulated as a
conditionally exempt SQG, but has changed
process materials and no longer generates
hazardous waste. Facility remains a LDR-pending clean closure of disposal area.

Revised: 1/7/91



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6249

RECEIVED

JUL 30 1991

Richard F. Celeste
Governor

June 7, 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

DESIGN ORIGINAL, INC.
SHELBY CO
HAZARDOUS WASTE
OHD063989545
EXEMPT SQG-TSD-LDF

Mr. Frank Pusey
President, Design Original, Inc.
402 Jackson St
Jackson Center, OH 45334

Dear Mr. Pusey,

On Wednesday, May 29, 1991, I visited Design Original and conducted an inspection to determine compliance with current hazardous waste management regulations. Mr. Dan Faulder showed me around the facility.

It appears that through changes in product usage, Design Original is no longer a generator of hazardous waste. Ohio EPA recognizes waste material generated from cleaning operations to be non-hazardous, based on lab data submitted in October 1990.

Due to past hazardous waste disposal activities conducted on-site until September, 1987, Design Original is also considered a Land Disposal Facility (LDF), subject to the facility standards specified in rule 3745-65 of the Ohio Administrative Code (O.A.C). Violations of these standards were identified in correspondence to you from Paul Pardi dated 10/17/89. Design Original remains in violation of these standards.

As Mr. David Combs has previously discussed with ERM Inc., Design Original is required to submit a formal closure plan to guide clean-up efforts of the land disposal unit. Consider this letter a formal request for submission of the plan, which is required in accordance with O.A.C. rules 3745-66-11 and 12; the plan was originally requested via correspondence from Paul Pardi dated 10/17/89. Information previously compiled by ERM, Inc., may be incorporated within this plan, which is to be submitted to this office within 30 days of receipt of this letter.

Please call if you have any questions.

Sincerely,

Christopher Cotton
Christopher Cotton

Hazardous Waste Management Unit
Enclosure

cc Laurie Stevenson, RCRA Enforcement, DSHWM, CO

Checklist on back



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6249

Richard F. Celeste
Governor

September 10, 1990

Re: DESIGN ORIGINAL, INC.
SHELBY COUNTY
HAZARDOUS WASTE
OHD063989545
EXEMPT SQG-TSD-LDF

Mr. Frank Pusey
Design Original, Inc.
402 Jackson Street
Jackson Center, Ohio 45334

Dear Mr. Pusey:

On September 6, 1990, Chris Cotton, George Nemore and I met with you and Doug Wagner (ERM-Midwest) at Design Original, Incorporated in order to conduct a RCRA compliance inspection. Copies of the completed RCRA Interim Status Inspection Form are enclosed for your information.

Design Original, Inc., was found to currently generate waste that has not yet been properly evaluated. This waste is now assumed to be an ignitable hazardous waste, but this has not been verified. Failure to evaluate waste is a violation of OAC 3745-52-11. This waste is generated at a rate less than 100 kilograms a month. Should this waste be verified as a hazardous waste, Design Original would be considered a Conditionally Exempt Small Quantity Generator. Design Original must correct this violation and must submit documentation demonstrating compliance no later than October 12, 1990.

Due to past hazardous waste disposal activities conducted on-site until September, 1987, Design Original, Inc. is also considered a Land Disposal Facility (LDF), subject to the facility standards specified in OAC Rule 3745-65. Violations of these standards were identified in my October 17, 1989 letter to you. Design Original remains in violation of these standards.

Design Original must submit a Closure/Post Closure Plan to the Ohio EPA which addresses the land disposal unit at this facility. As a preliminary step to submittal of a closure plan, ERM-Midwest submitted to Ohio on EPA April 27, 1990 a "Contamination Assessment Plan" on behalf of Design Original, Inc. comments regarding this plan will be addressed in a separate letter. Design Original Inc. must submit a closure plan within 30 days of the date of completion of the activities described in this assessment plan.

Design Original, Inc.
September 10, 1990
Page 2

Ground Water monitoring requirements and financial requirements were not addressed as part of this inspection. Please call me at (513) 285-6357 if you have any questions.

Sincerely,

Paul D. Pardi

Paul D. Pardi
Hazardous Waste Group Leader

PDP/mlf

cc: DSHWM Enforcement Section/CO

KCRA INTERIM STATUS INSPECTION FORM

Facility Name: Design Originals, Inc. Date of Inspection 9/16/90 10:00 AM

Address: 402 Jackson St HMTB #: _____
Jackson Center 10th USEPA ID #: _____

County: Skelly Facility Phone #: _____
 Facility Contact: Frank Pusy - Design Original Facility Contact Phone #: _____
Doug Wagner - Eddy District Safety Equipment #: _____

Inspector(s) Name(s): Paul Birdi - SWBO
George Alworth - SWBO
Chris Cotton - SWBO

STATUS
 Cond. Ex. SQC ☒ SQC _____ Generator _____ Transporter _____ Treatment _____ Storage _____ Disposal _____ *

ACTIVITIES
 Containers _____ Tanks _____ Surface Impoundments _____ Incineration/Thermal treatment _____
 Waste pile _____ Land treatment _____ Landfill _____ Groundwater monitoring _____
 Used oil burner _____ Hazardous waste fuel burner/blender _____

- Does the facility produce "discarded materials" as defined in 3745-51-02(A)?
 Y/N/NA Y REMARK # _____
- Are they :
 a. Abandoned (disposed; incinerated; accumulated, stored, or created prior to disposal)?
Y
 b. Recycled?
N
 c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)?
N
 3. If recycled or accumulated, treated or stored before recycling, is the waste:
 a. Used in a manner constituting disposal?
N
 b. Burned for energy recovery?
N
 c. Reclaimed? (Refer to Table 1 of 3745-51-02)
N
 d. Accumulated speculatively?
N
 4. Is the material recycled by being:
 a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?
N
 b. Used as an effective substitute for commercial products?
N
 c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?
N

* Design Originals is listed as an LDF as a result of some illegal disposal activity occurring prior to Sept. 1987

- | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|--|---------------|-------------------|
| 5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist. | <u>NA</u> | <u>Exempt SQG</u> |
| 6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40? | <u>N</u> | |
| 7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43? | <u>NA</u> | |
| 8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted. | <u>NA</u> | |
| 9. Is the facility operating in compliance with the terms and conditions of its HWRB permit? | <u>NA</u> | |
| 10. Has the facility submitted a Part B? | <u>N</u> | |
| 11. Was advance notice of the inspection given? If so, how far in advance? | <u>Y</u> | <u>1 week</u> |

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

REMARKS. GENERAL INFORMATION.

Facility generates waste at a rate $< 100 \text{ kg/month}$, therefore at a rate ~~not~~ of a conditionally exempt small quantity generator.

Then, illegal disposal activity creates also makes them subject to TSD standards. Facility is not currently complying with TSD/LDF standards.

Small Quantity Generator, Conditionally Exempt SQG

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?

2. Does the generator produce <100 kg of waste per month? (conditionally exempt SQG)

3. Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-51-05(E), 3745-51-05(F)

4. Does the conditionally exempt SQG ensure delivery to an off-site permitted TSD?

5. Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete items 6-21.

SQG

6. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?

7. Do quantities of hazardous waste accumulated on-site ever exceed 6000 kg/s? (If so, TSD standards apply. Complete application TSD checklists.) [3745-52-34(D) and (F)] (262.34(d) and 262.34(f))

8. If wastes are stored in containers, are wastes placed in containers in compliance with 3745-66-70 to 3745-66-77 except 3745-66-76? [3745-52-34(D)(2)] (262.34(d)(2) Complete Management of Containers checklist.

9. If wastes are stored in tanks, are wastes stored in tanks in compliance with 3745-66-992? Complete Accumulation in Tanks for SQG's checklist.

*1. Facility generates a waste which has been assumed to be ignitable, but facility is unsure of this and has not taken steps to verify this.

Y	N	NA	REMARK #
✓			#1
✓			
✓			
NA			How not get disposed of waste
✓			
NA			
✓			
✓			

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

Y/N/NA REMARK #

1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?

Y _____

2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))

Y _____

3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))

Y _____
Y _____

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4. Does the facility have -

Y _____

- a. A 24-hour surveillance system, or
b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)] (a and b) (265.14(b)(2))

Y _____

5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))

Y _____

6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)

Y _____

Y/N/NA REMARK #

b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))

N _____

7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

N _____

8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))

N _____

9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)

- a. Protection from sources of ignition. _____
- b. Physical separation of incompatible waste materials. NA _____
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. Y _____
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)) NA _____

1

#1. Waste presumed to be ignitable, but not verified.

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

- | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|--|--|---|
| 1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste?
[3745-65-31] (265.31) | <u>Y</u> | <u> </u> |
| 2. Has there been a fire, explosion or non-planned release of waste at the facility?
a. If yes, has the contingency plan been implemented? | <u>NA</u> | <u> </u> |
| 3. It required due to actual hazards associated with the waste, does the facility have the following equipment:
[3745-65-32(A)(B)(C)(D)] (265.32)
a. Internal alarm system?
b. Access to telephone, radio or other device for summoning emergency assistance?
c. Portable fire control equipment?
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? | <u>Y</u>
<u>Y</u>
<u>Y</u>
<u>Y</u>
<u>Y</u> | <u> </u>
<u> </u>
<u> </u>
<u> </u>
<u> </u> |
| 4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary?
[3745-65-33] (265.33) | <u>Y</u> | <u> </u> |
| 5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34) | <u>Y</u> | <u> </u> |
| 6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35) | <u>NA</u> | <u> </u> |
| 7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a)) | <u>Y</u> | <u> </u> |

8.

Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(b)] (265.37(b))

Y/N/NA REMARK #

WA ---

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? N
 - b. Arrangements or agreements with local or state emergency authorities? N
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? N
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? N
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(F))? N
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) N
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) N
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) N
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) NA

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).	<u>N</u>	<u> </u>
b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	<u>N</u>	<u> </u>
c. The estimated (or actual) weight, volume or density of the waste material?	<u>N</u>	<u> </u>
d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix 1, Table 2)	<u>N</u>	<u> </u>
e. The present physical location of each hazardous waste within the facility?	<u>N</u>	<u> </u>
f. Records of incidents which require implementation of the Contingency Plan?	<u>N</u>	<u> </u>
g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	<u>N</u>	<u> </u>
h. Records of any waste analyses and trial tests required to be performed?	<u>N</u>	<u> </u>
i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	<u>N</u>	<u> </u>
j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6); (265.73(b)(6))?	<u>N</u>	<u> </u>

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

Y/N/NA REMARK #

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?
 - a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.
 - b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).
 - c. An estimate of the maximum amount of hazardous waste ever in inventory.
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.
 - e. The year closure is expected to begin and a schedule for the various phases of closure.
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))
4. Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))

5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a)) ✓
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(b)] (265.113(b)) NA
7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115) NA
8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plat in accordance with OAC 3745-66-16? ✓
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan? None
10. If closure was partial, list the regulated units which remain in use at the facility: _____
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118) ✓
12. Does the post-closure plan include:
- a. A description of proposed ground water monitoring? ✓
 - b. A description of planned maintenance activities? ✓
 - c. The name, address and phone number of person/office to contact during the post-closure period? ✓

Y/N/NA REMARK #

Y/N/NA REMARK #

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)

NA

14. Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and
- b. the type, quantity and location of waste?
Land use is restricted pursuant to 3745-66-17?
[3745-66-19] (265.119)

NA

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	<u>Y</u>	<u> </u>
b. In good condition [3745-66-71] (265.171)?	<u>Y</u>	<u> </u>
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	<u> </u>
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>Y</u>	<u> </u>
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>Y</u>	<u> </u>
4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>Y</u>	<u> </u>
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>Y</u>	<u> </u>
6. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>Y</u>	<u> </u>

OAC 3745-68 LANDFILLS (40 CFR PART 265, SUBPART N)

Y/N/NA REMARK #

1. General Operating Requirements. Does the facility provide the following:

- a. Run-on control capable of handling a 24-hr, 25-yr storm? ✓
- b. Run-off control capable of handling a 24-hr, 25-yr storm? ✓
- c. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)] ✓
- d. Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)] (265.302(c)) ✓
- e. Control of wind dispersal of hazardous waste? [3745-68-02(D)] (265.302(d)) ✓

2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09] (265.309)

- a. A map showing the exact location and dimensions of each cell? ✓
- b. The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)] (265.309(b)) ✓
- 3. Are ignitable or reactive wastes created so the resulting mixture is no longer ignitable or reactive? [3745-68-12] (265.312(a)(b)) ✓

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 3745-65-17 AND 3745-68-12(B) APPLY. (40 CFR 265.17(b))

- | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|---|---------------|-------------------|
| 4. Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) It not, the provisions of 3745-68-15 apply. (265.17(b)) | <u>NA</u> | <u> </u> |
| 5. Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315) | <u>NA</u> | <u> </u> |
| 6. Are containers at least 90% full prior to placement in the landfill? [3745-68-14(A)] (265.314(a)) | <u>NA</u> | <u> </u> |
| 7. Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are not longer present. [3745-68-14(A)] (265.314(a)) | <u>N</u> | <u> </u> |
| 8. Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] (265.314(b)) If yes, has all free liquid been removed, absorbed or otherwise eliminated? | <u>NA</u> | <u> </u> |
| 9. Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] (265.314(d)) | <u>N</u> | <u> </u> |
| 10. Are the special requirements for lab pack waste met? [3745-68-16] (265.316) | <u>NA</u> | <u> </u> |
| 11. Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112) | <u>N</u> | <u> </u> |
| 12. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)] (265.118(d)) | <u>NA</u> | <u> </u> |

	<u>Y/N/NA</u>	<u>REMARK #</u>
13. Has the closure/post-closure plan been submitted to the Director/ Regional Administrator 180 days prior to beginning closure? [3745-66-18(E)] (265.118(e))	<u>N</u>	<u> </u>
14. Does the plan contain information required in 3745-68-10? (265.310)	<u>N</u>	<u> </u>
15. Is a closure cost estimate available?	<u>N</u>	<u> </u>
16. Has closure begun?	<u>N</u>	<u> </u>
17. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) (265.117(c)) as required in 3745-66-19 (265.119(b))?	<u>N</u>	<u> </u>



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

CHIEF
OF
FILE
141
20
For Hand Copy File

June 15, 1990

Re: Design Originals
OHD063989545
Financial Assurance

Frank Pusey
Design Originals
402 Jackson Street
P.O. Box 357
Jackson Center, Ohio 45334

Dear Mr. Pusey:

On June 13, 1990, I conducted a review of financial assurance documents for Design Originals to evaluate compliance with rules 3745-66-42 through 3745-66-47 of the Ohio Administrative Code (OAC). Pursuant to these rules, Design Originals is required to provide closure and post-closure cost estimates, financial assurance for closure and post-closure care, and liability coverage for its Jackson Center facility.

Based on my review, I have determined that Design Originals is in violation of the aforementioned rules of the OAC in that no documentation of compliance has been submitted to Ohio EPA.

As a result of my review, I note that these issues are currently being addressed through the Ohio Attorney General's Office. If you should have any questions concerning this matter, you may call (614)644-2944.

Sincerely,

Teri Martin

Teri Martin
RCRA Enforcement Section
Division of Solid and Hazardous Waste Management

cc: Mike Savage, Manager, RCRA Enforcement
Paul Pardi, SWDO
Mike Marous, AGO

ILLEGAL NON-NOTIFIED
STATUS
(PUSEY WENT TO JAIL FOR
THIS). 26 mo.



State of Ohio Environmental Protection Agency

Southwest District Office

100 South Main Street
Dayton, Ohio 45402-2086
(513) 449-6357
FAX (513) 449-6249

Richard F. Celeste
Governor

*to: Jim
File*

*FILE
HSP
ISS
LDF*

October 17, 1989

Re: DESIGN ORIGINAL INC.
SHELBY COUNTY
HAZARDOUS WASTE
OHD 063989545
TSD-LDF

Mr. Frank Pusey
Design Original, Inc.
402 Jackson Street
Jackson Center, Ohio 45334

Dear Mr. Pusey:

On September 7, 1989, Mike Proffitt and I conducted an inspection at Design Original, Inc. The purpose of my inspection was to determine the status and compliance of this facility with Ohio's Hazardous Waste Rules. Mike Proffitt, who is with our Division of Ground Water, was present to complete a Comprehensive Ground Water Monitoring Evaluation (CME), which is intended to determine a facility's compliance with applicable groundwater monitoring requirements. During the inspection we met with you and Mr. John Gartland, your legal counsel from Arter and Hadden. On October 11, 1989 I spoke with Mr. Gartland and Mr. Rich Fahey (also of Arter and Hadden) by telephone to complete some aspects of the inspection not covered during my September 7 visit. A copy of the completed inspection form is enclosed for your information.

The results of the CME will not be addressed in this letter. Any violations/deficiencies of groundwater monitoring requirements will be addressed under a separate letter. The findings of my inspection are as follows:

1. Because of past hazardous waste disposal activities conducted on site, Design Original, Inc. is considered a Land Disposal Facility (LDF), subject to the facility standards specified in Ohio Administrative Code (OAC) Rule 3745-65. Design Original is in violation of the following regulations:
 - a. OAC 3745-50-40-Submittal of Part A application
 - b. OAC 3745-65-13-Waste analysis and waste analysis plan
 - c. OAC 3745-65-14-Security
 - d. OAC 3745-65-15-Inspection Plan
 - e. OAC 3745-65-16-Personnel Training
 - f. OAC 3745-65-52-Contingency Plan
 - g. OAC 3745-65-73-Operating Record
 - h. OAC 3745-65-75-Annual Report
 - i. OAC 3745-66-12-Closure Plan

Mr. Pusey
October 17, 1989
Page 2

- j. OAC 3745-66-16-Survey Plat
 - k. OAC 3745-66-18-Post Closure Plan
 - l. OAC 3745-66-19-Deed
 - m. OAC 3745-68-Landfill Requirements
2. Design Original, Inc. is in violation of OAC 3745-52-11 because it has not properly characterized waste currently generated at the facility. Because the wastes have not been characterized, an accurate determination of this facility's generator status and compliance cannot be made. Design Original must have wastes analyzed and review Material Safety Data Sheets (MSDS) as necessary to properly characterize the wastes currently generated. Please submit to me within 30 days of the date of this letter, copies of any waste analysis data and MSDS used to characterize the waste generated at Design Original.
3. Within 60 days of the date of this letter, Design Original must submit a Closure/Post-Closure Plan which addresses how any land disposal units located on site will be closed in a way that meets the closure performance standards outlined in OAC 3745-65-12. Mike and I will be glad to meet with you to discuss the contents of such a plan.

Please call me at 513 449-6357 if you have any questions or comments.

Sincerely,

Paul D. Pardi

Paul D. Pardi
Solid and Hazardous Waste Management Unit

PDP/cjs

Enclosure

cc: Mr. John Gartland, Attorney at Law
Teri Martin, DSHWM, CO



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

CMEL
FAD
LDF

Hand copy

September 8, 1989

Re: Design Originals
Shelby County
Financial Assurance

Frank Pusey
Design Originals
402 Jackson Street
P.O. Box 357
Jackson Center, OH 45334

Dear Mr. Pusey:

Design Originals has been found to be operating a hazardous waste facility as that term is defined in rule 3745-50-10(A)(32) of the Ohio Administrative Code (OAC). Consequently, Design Originals is required to provide financial assurance for closure, post-closure care, and liability coverage under OAC rules 3745-55-42 through -47 and/or 3745-66-42 through -47.

Review of Ohio EPA's files concerning Design Originals reveals that the facility has not submitted documentation to demonstrate compliance with the financial rules cited above. Therefore, this facility is in violation of OAC rules 3745-55-42 through -47 and/or 3745-66-42 through -47.

Under these rules, Design Originals must provide estimates for closure and/or post-closure costs, a mechanism for closure and/or post-closure care and liability coverage for this hazardous waste facility.

As a result of this review, I also note that these issues are currently pending before the Office of the Attorney General. Please call me at (614)644-2944 if you should have any questions regarding these matters.

Sincerely,

Teri Martin
RCRA Enforcement Section
Division of Solid and Hazardous Waste Management

TM/drr
1008S/89

cc: Mike Savage, CO
Jeff Hines, SWDO
Mike Marous, AGO

NON-NOTIFIER

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2050-0028 Expires 9-30-88
GSA No. 0246-EPA-07



Notification of Hazardous Waste Activity

United States Environmental Protection Agency
Washington, DC 20460

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C
C

COPY

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)

C
F

063989545

C
1

A

880729

OCT 03 1988

I. Name of Installation

Design Originals Inc.

II. Installation Mailing Address

Street or P.O. Box

C
3

402 Jackson Street

City or Town

State

ZIP Code

C
4

Jackson Center

OH

45334

III. Location of Installation

Street or Route Number

C
5

402 JACKSON STREET

City or Town

State

ZIP Code

C
6

JACKSON CENTER

OH

45334

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2

OGLE KIM

USEPA

3128861478

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R

~~FRANK PUSEY~~

P

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

- ☐ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.
☐ 2. Transporter
☐ 3. Treater/Storer/Disposer
☐ 4. Underground Injection
☐ 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner
☐ 7. Specification Used Oil Fuel Marketer (or On site Burner) Who First Claims the Oil Meets the Specification

233=N

JUL 29 1988

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler

☐ B. Industrial Boiler

☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

- ☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

Shelby - 149

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- ☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

LW-9-30-88



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

SEP 28 1988

5HS-JCK-13

Dear Notifier:

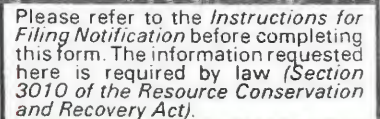
Enclosed you will find the U.S. Environmental Protection Agency (U.S. EPA) Identification (ID) number that has been assigned to your installation. This ID number must appear on all manifest forms when transporting hazardous waste. You will find your ID number on the second line of the copy of the enclosed notification form. This letter confirms that you have filed a Notification of Hazardous Waste Activity (Form 8700-12) to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). This letter and the enclosed copy of notification form should be retained for future use.

If you have any further questions regarding hazardous waste activity, please contact our Hotline at (312) 886-4001.

Sincerely yours,

Art Kawatachi, Chief
Information Section
RCRA Program Management Branch

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-07



Continue on reverse

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: DESIGN ORIGINAL, INC. Date of Inspection 9/7/89
 Address: 402 JACKSON ST. HWFB #: _____
 County: JACKSON CENTER, OH 45334 USEPA ID #: 04D 063789545
 Facility Contact: SHELBY Facility Phone #: 513-596-5121
 Inspector(s) Name(s): FRANK POSEY Facility Contact Phone #: _____
JOHN GARTLAND (ATTY) Safety Equipment #: _____
PAUL PARDI - 54 HMMV-SWDO
MIKE PROFFITT - D6W - SWDO

STATUS

Cond.	Ex.	SG*	SG	Generator	Transporter	Treatment	Storage	Disposal*
<u>ACTIVITIES</u>								
<u>Containers</u>		<u>Tanks</u>		<u>Surface Impoundments</u>		<u>Incineration/Thermal treatment</u>		
<u>Waste pile</u>		<u>Land treatment</u>		<u>Landfill</u>		<u>Groundwater monitoring</u>		
<u>Used oil burner</u>		<u>Hazardous waste fuel burner/blender</u>						

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	<u>Y</u>	_____
2. Are they :		
a. Abandoned (disposed; incinerated; accumulated, stored, or treated prior to disposal)?	_____	_____
b. Recycled?	_____	_____
c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)?	_____	_____
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	_____	_____
b. Burned for energy recovery?	_____	_____
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	_____	_____
d. Accumulated speculatively?	_____	_____
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	_____	_____
b. Used as an effective substitute for commercial products?	_____	_____
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?	_____	_____

Y/N/NA REMARK #

5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.

6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?

8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.

9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?

10. Has the facility submitted a Part B?

11. Was advance notice of the inspection given? If so, how far in advance?

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

The facility is considered a TSD (Land Disposal Facility) because of past hazardous waste disposal activities (the dumping of spent toluene at the site). The facility does not comply with the majority of facility standards. The facility generates a very small quantity of waste. The waste has not yet been properly characterized to determine whether it is hazardous. If the wastes generated are hazardous, the facility generates this waste at a rate equivalent to that of a conditionally exempt small quantity generator (<100 kg/month).

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)? N _____
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)? N _____
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))? N _____
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? #1 _____
If so, complete appropriate checklist.
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22? NA #2 _____
 - b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)? NA _____
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)? NA _____
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)? NA _____
 - e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))? NA _____
 - f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)? NA _____

#1. Not known until wastes are properly characterized, but more than likely facility generates waste at a rate of <100 kg/mo.

#2. wastes have been shipped off-site.

Y/N/NA REMARK #

6. Does the generator meet the following hazardous waste pre-transport requirements: _____

- a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)? N #3
- b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)? N #3
- c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)? N #3

7. Does the generator import or export hazardous waste? N #3

If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)? NA

8. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:

- a. The containers or tanks are clearly marked with the words "Hazardous Waste"? N #3
- b. The date that accumulation began is clearly marked on each container? N #3
- c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist. _____

- 5 -

#3. If ~~ink~~ sludge is determined to be hazardous, containers were not labelled properly.

Y/N/NA REMARK #

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist. NA
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time? NA
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? NA
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77? NA
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating? NA
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days? #4
10. Has the generator been granted an extension by the Director/Regional Administrator for accumulation in excess of ninety (90) days? NA
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)? Y #5

#4 Cannot be determined until waste characterization is complete

#5 Disposal prior to issuance of ID #.

Y/N/NA REMARK #

12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)

 N _____

13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)

 N _____

14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?

 N _____

15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.

REMARKS, GENERATOR REQUIREMENTS

Small Quantity Generator, Conditionally Exempt SQG

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	<u>N</u>	
2. Does the generator produce <100 kg of waste per month? (conditionally exempt SQG)		<u>#6</u>
3. Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-51-05(E), 3745-51-05(F)	<u>N</u>	
4. Does the conditionally exempt SQG ensure delivery to an off-site permitted TSD?		<u>No wastes shipped off to date.</u>
5. Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete items 6-21.	<u>N</u>	
<u>SQG</u>		
6. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?		
7. Do quantities of hazardous waste accumulated on-site ever exceed 6000 kg/s? (If so, TSD standards apply. Complete application TSD checklists.) [3745-52-34(D) and (F)] (262.34(d) and 262.34(f))		
8. If wastes are stored in containers, are wastes placed in containers in compliance with 3745-66-70 to 3745-66-77 except 3745-66-76? [3745-52-34(D)(2)] (262.34(d)(2) Complete Management of Containers checklist.		
9. If wastes are stored in tanks, are wastes stored in tanks in compliance with 3745-66-992? Complete Accumulation in Tanks for SQG's checklist.		

#6. The facility probably generates less than 100 kg/month - cannot be determined until waste characterization is complete.

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

Y/N/NA REMARK #

1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))? N
2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b)) N
3.
 - a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1)) Y
 - b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2)) Y

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4. Does the facility have -
 - a. A 24-hour surveillance system, or
 - b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)] (a and b) [265.14(b)(2)] N
5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary: [3745-65-14(C)] (265.14(c)) N
6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15) N

Y/N/NA REMARK #

b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))

N

7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

N

8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))

N

9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)

- a. Protection from sources of ignition. #7
- b. Physical separation of incompatible waste materials. NA
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. #7
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)) NA

#7. Do not know if wastes generated are ignitable until characterization is complete.

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	<u> </u>
2. Has there been a fire, explosion or non-planned release of waste at the facility? a. If yes, has the contingency plan been implemented?	<u>N</u>	<u> </u>
3. It required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32) a. Internal alarm system? b. Access to telephone, radio or other device for summoning emergency assistance? c. Portable fire control equipment? d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u> <u>Y</u> <u>Y</u> <u>Y</u>	<u> </u> <u> </u> <u> </u> <u> </u>
4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	<u> </u>
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	<u> </u>
6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>NA</u>	<u> </u>
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	<u> </u>

Y/N/NA REMARK #

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

NA

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):

- a. Actions to be taken by personnel in the event of an emergency incident?
- b. Arrangements or agreements with local or state emergency authorities?
- c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
- d. A list of all emergency equipment including location, physical description and outline of capabilities?
- e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?

2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)

3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)

4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)

5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))

No contingency plan

NA

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(b)(1)] (265.73(b)(1)).	N	
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	N	
c.	The estimated (or actual) weight, volume or density of the waste material?	N	
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix 1, Table 2)	N	
e.	The present physical location of each hazardous waste within the facility?	N	
f.	Records of incidents which require implementation of the Contingency Plan?	N	
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	N	
h.	Records of any waste analyses and trial tests required to be performed?	N	
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	N	
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6); (265.73(b)(6))?	N	

Y/N/NA REMARK #

k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?

N

2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?

N

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)

NA

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?

b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.

/

/

4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?

/

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?

/

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	<u>N</u>	<u> </u>
a.	A description of how each hazardous waste management unit will be closed in accordance with 265.111.	<u> </u>	<u> </u>
b.	A description of how final closure will meet the requirements of 3745-66-11 (265.111).	<u> </u>	<u> </u>
c.	An estimate of the maximum amount of hazardous waste ever in inventory.	<u> </u>	<u> </u>
d.	A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	<u> </u>	<u> </u>
e.	The year closure is expected to begin and a schedule for the various phases of closure.	<u> </u>	<u> </u>
f.	A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	<u> </u>	<u> </u>
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	<u>NA</u>	<u> </u>
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	<u>N</u>	<u> </u>
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	<u>NA</u>	<u> </u>

Y/N/NA REMARK #

5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))

NA

6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))

NA

7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)

NA

8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plat in accordance with OAC 3745-66-16?

N

9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?

NONE

10. If closure was partial, list the regulated units which remain in use at the facility:

11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)

N

12. Does the post-closure plan include:

- a. A description of proposed ground water monitoring?
- b. A description of planned maintenance activities?
- c. The name, address and phone number of person/office to contact during the post-closure period?

N

N

N

Y/N/NA REMARK #

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119) N _____
14. Has the owner of the property on which a disposal unit is located recorded on the deed that:
- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? N _____
- b. Land use is restricted pursuant to 3745-66-17? N _____
- [3745-66-19] (265.119)

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	Y/N/NA	REMARK #
1. Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	<u>N</u>	<u>#8</u>
b. In good condition [3745-66-71] (265.171)?	<u>Y</u>	<u></u>
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	<u></u>
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>N</u>	<u>#8</u>
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>N</u>	<u>#8</u>
4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>N</u>	<u>#8</u>
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>Y</u>	<u></u>
6. Are containers holding hazardous wastes stored separate from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>Y</u>	<u></u>

#8. If mk waste is hazardous, these violations have occurred.

OAC 3745-68 LANDFILLS (40 CFR PART 265, SUBPART N)

Y/N/NA REMARK #

1. General Operating Requirements. Does the facility provide the following:

- | | | | |
|----|---|----------|-----------------|
| a. | Run-on control capable of handling a 24-hr, 25-yr storm?
[3745-68-02(A)] (265.302(a)) | <u>✓</u> | <u> </u> |
| b. | Run-off control capable of handling a 24-hr, 25-yr storm?
[3745-68-02(B)] (265.302(b)) | <u>✓</u> | <u> </u> |
| c. | If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)] | <u>✓</u> | <u> </u> |
| d. | Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)] (265.302(c)) | <u>✓</u> | <u> </u> |
| e. | Control of wind dispersal of hazardous waste?
[3745-68-02(D)] (265.302(d)) | <u>✓</u> | <u> </u> |

2. Surveying and Recordkeeping. Does the operating record include:
[3745-68-09] (265.309)

- | | | | |
|----|--|----------|-----------------|
| a. | A map showing the exact location and dimensions of each cell?
[3745-68-09(A)] (265.309(a)) | <u>✓</u> | <u> </u> |
| b. | The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)] (265.309(b)) | <u>✓</u> | <u> </u> |
| 3. | Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12] (265.312(a)(b)) | <u>✓</u> | <u> </u> |

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 3745-65-17 AND 3745-68-12(B) APPLY. (40 CFR 265.17(b))

	Y/N/NA	REMARK #
4. Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) It not, the provisions of 3745-68-15 apply. (265.17(b))	<u>NA</u>	<u> </u>
5. Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315)	<u>NA</u>	<u> </u>
6. Are containers at least 90% full prior to placement in the landfill?	<u>NA</u>	<u> </u>
7. Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are not longer present. [3745-68-14(A)] (265.314(a))	<u>N</u>	<u> </u>
8. Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] (265.314(b)) If yes, has all free liquid been removed, absorbed or otherwise eliminated?	<u>NA</u>	<u> </u>
9. Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] (265.314(d))	<u>N</u>	<u> </u>
10. Are the special requirements for lab pack waste met? [3745-68-16] (265.316)	<u>NA</u>	<u> </u>
11. Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112)	<u>N</u>	<u> </u>
12. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)] (265.118(d))	<u>NA</u>	<u> </u>

	Y/N/NA	REMARK #
13. Has the closure/post-closure plan been submitted to the Director/ Regional Administrator 180 days prior to beginning closure? [3745-66-18(E)] (265.118(e))	N	
14. Does the plan contain information required in 3745-68-10? (265.310)	N	
15. Is a closure cost estimate available?	N	
16. Has closure begun?	N	
17. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) (265.117(c)) as required in 3745-66-19 (265.119(b))?	N	

**D. Corrective
Action**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY -7 2014

CERTIFIED MAIL 7009 1680 0000 7663 8685
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

IN THE MATTER OF:

Mr. Frank Pusey
Design Original, Inc.
402 Jackson Street
Jackson Center, OH 45334

U.S. EPA I.D. NO.: OHD 063 989 545

ATTENTION: Mr. Frank Pusey, Owner

REQUEST FOR INFORMATION

By this letter, the United States Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of U.S. EPA to require you to submit certain information.

This request requires Design Original, Inc. to submit certain information relating to potential groundwater contamination at its facility located at 402 Jackson Street in Jackson Center, OH. We are requiring this information to determine the Design Original, Inc.'s compliance status with the RCRA Corrective Action set forth at 42 USC § 6927. Section 3007 of RCRA authorizes the Administrator, U.S. Environmental Protection Agency to require Design Original to submit this information. Attachment 1 specifies the information you must submit. You must submit this information within 21 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Brian P. Freeman, Corrective Action Project Manager, 77 West Jackson Boulevard, LR-9J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 CFR Part 2, B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Design Original, Inc. must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. ' ' 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Design Original, Inc. to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Brian P. Freeman, Corrective Action Project Manager at (312)353-2720.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Beedle", written in a cursive style.

Michael Beedle, Acting Chief
Remediation and Reuse Branch
Corrective Action Section 1

cc: Randy Kirkland, Supervisor, Ohio EPA – DERR (Attachment)

ATTACHMENT 1

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.
2. Provide all documents relating to the collection and/or analyses of samples of groundwater at the facility. This includes, but is not limited to, all records on sample collection; chain-of-custody forms; Quality Assurance or Quality Control plans or procedures; log books; analytical reports; records identifying or describing the analytical methods used to analyze samples; data-validation records; records on the calibration of equipment; and emails or other correspondence discussing the sampling or analyses.
3. Provide all documents relating to the collection and/or analyses of samples of groundwater on properties adjacent to the facility. This includes, but is not limited to, all records on sample collection; chain-of-custody forms; Quality Assurance or Quality Control plans or procedures; log books; analytical reports; records identifying or describing the analytical methods used to analyze samples; data-validation records; records on the calibration of equipment; and emails or other correspondence discussing the sampling or analyses.
4. Provide all documents relating to the groundwater flow at the facility.
5. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

-End-

LAND AND CHEMICALS DIVISION

Type of Document: Info Request

Name of Document: Design Original

AUTHOR: ^{NAMES} Brian P. Ziem ^{DATE} 5/6/14

APA: _____

SECTION CHIEF: M. K. B. 5-6-14

BRANCH CHIEF: _____

DIVISION APA: _____

DIVISION DIRECTOR: _____

OTHERS: CRC P. Bending Sec attached email 5-6-14

DRA: _____

RA: _____

RETURN TO: _____

PHONE: _____

COMMENTS: Please place a copy of original
into file room and scan a copy to Brian Freeman

Beedle, Michael

From: Bending, Padmavati
Sent: Tuesday, May 06, 2014 1:39 PM
To: Beedle, Michael
Cc: Freeman, Brian
Subject: RE: Design Original

Looks good. You can use this email to document my concurrence. - Padma

Padmavati G. Bending
Associate Regional Counsel
U.S. EPA, Region 5
Office of Regional Counsel (C-14J)
77 West Jackson Blvd.,
Chicago, IL 60604

(312) 353-8917
(312) 582-5154 (fax)

From: Beedle, Michael
Sent: Tuesday, May 06, 2014 10:52 AM
To: Bending, Padmavati
Cc: Freeman, Brian
Subject: Design Original

Padma,
Brian and I finalized this information request today.
Could you review, make any edits, and send your concurrence on the request.
Email concurrence is acceptable. If you want we can bring a hard copy sign-off sheet to your office.
After your concurrence, we mail it out this week, hopefully.
Thanks
Mike

Michael Beedle
Acting Chief
Corrective Action Section 1
Remediation and Reuse Branch
Land and Chemicals Division
USEPA Region 5

Phone: 312 353 7922

**U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES**

TES X

**CONTRACT NO. 68-W9-0007
WORK ASSIGNMENT NO. RO5043**

**INTERIM FINAL
PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VSI) REPORT
FOR
RCRA FACILITY ASSESSMENT (RFA)
AT
DESIGN ORIGINAL, INC.
JACKSON CENTER, OHIO
OHD 063 989 545**

U.S. EPA REGION V

**METCALF & EDDY, INC.
PROJECT NO. 153043-0009-626**

WORK PERFORMED BY:

**METCALF & EDDY, INC.
2800 CORPORATE EXCHANGE DRIVE, SUITE 250
COLUMBUS, OHIO 43231**

SEPTEMBER 1993

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EXECUTIVE SUMMARY

At the request of U.S. EPA, Metcalf & Eddy (M&E) initiated a RCRA Facility Assessment (RFA) of Design Original, Inc. in Jackson Center, Ohio. M&E conducted the first two steps in the RFA, the Preliminary Review and the Visual Site Inspection (PR/VSI). The purpose of the PR/VSI is to summarize available information about the site and to assist the U.S. EPA in recommending further steps in the corrective action process.

Design Original, Inc. is located at 402 Jackson Street, Jackson Center, Ohio. The facility manufactures custom printed sportswear using silk screening processes. Design Original was designated a Land Disposal Facility because of its hazardous waste disposal activities, which included illegal dumping of toluene at the facility site.

A VSI was conducted on August 30, 1990, following review of U.S. EPA and Ohio EPA files. Two Solid Waste Management Units (SWMUs) and one Area of Concern (AOC) were identified at the facility (Table ES-1). These SWMUs were the known dump site containing silk screen cleaning wastes (other possible dumping areas have not yet been identified), and the dumpster area used to dispose of spent rags and containers, located in the same vicinity as the dump site. The present disposal of waste is considered an Area of Concern because the waste has not yet been characterized. Some of the wastes (e.g., haze remover, ink, Aeroflex Bio-wash) are collected in pails and placed in a 55-gallon drum. This drum had never been emptied at the time of the VSI. The spent rags are put in the dumpster and any other material is either put in the dumpster and/or washed down the drains.

RELEASED 4/9/01
DATE _____
RIN # _____
INITIALS MAV

ENFORCEMENT
CONFIDENTIAL

TABLE ES-1
DESIGN ORIGINAL, INC.
CURRENT SOLID WASTE MANAGEMENT UNITS

Solid Waste Management Unit	Operational Dates	Release History
* Dump Site of Silk Screen Cleaning Waste	Possibly October 1984 to September 1987	Possibly October 1984 to September 1987
Dumpster Area	Possibly October 1984 to September 1988	Possibly October 1984 to September 1987
* Present Disposal of Waste	September 1988 until Present	Unknown

**ENFORCEMENT
CONFIDENTIAL**

RELEASED
 DATE 9/9/81
 RIN # _____
 INITIALS WV

* SMWUs and Areas of Concern identified during the PR.

**PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VSI) REPORT
RCRA FACILITY ASSESSMENT (RFA)**

FACILITY NAME: DESIGN ORIGINAL, INC.
402 JACKSON STREET, JACKSON CENTER, OHIO 45334
LATITUDE: 40° 26' 57"
LONGITUDE: 84° 01' 57"
SITE CONTACT: FRANK PUSEY
PHONE #: (513) 596-5121
EPA ID#: OHD 063 989 545

1.0 INTRODUCTION

This section of the RCRA Facility Assessment (RFA) report covers the purpose and scope of the RFA process. It also describes the other sections in this report.

1.1 Background

This report was prepared by Metcalf & Eddy, Inc. (M&E) under the Technical Enforcement Support (TES) X contract at the request of the United States Environmental Protection Agency (U.S. EPA) Region V. It describes the Preliminary Review (PR) of file material for the Design Original, Inc. facility and the Visual Site Inspection (VSI) of the facility. These are the first two steps in conducting a Resource Conservation & Recovery Act (RCRA) Facility Assessment (RFA). The RFA is the first phase of the RCRA corrective action program and consists of a PR, VSI, and, if appropriate, a sampling visit (SV). The purpose of this report is to summarize available information about the site and to assist the U.S. EPA in recommending further steps in the corrective action process.

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide new authorities for the U.S. Environmental Protection Agency (EPA) to compel owners and operators of hazardous waste treatment, storage, and disposal facilities to take corrective actions for releases of hazardous wastes and hazardous constituents. These authorities apply to releases at facilities subject to the permitting requirements of RCRA Section 3005(e) and at facilities applying for RCRA permits. These amendments require EPA to address the

need for corrective action for previously unregulated releases to air, surface water, soil, and groundwater, and to address the generation of subsurface gas. Section 3004(u) of RCRA allows EPA to require corrective actions after permit issuance through a schedule of compliance. Section 3008(h) allows EPA to require corrective actions through an enforcement action.

This report summarizes file information and observations made during the VSI related to releases of hazardous waste at Design Original, Inc. facility located in Shelby County, Ohio (see Figure 1). Releases into all media are considered, including groundwater, air, surface water and soils, and subsurface gas releases. All areas of potential release are considered, but the focus is on SWMUs.

A Solid Waste Management Unit (SWMU) is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas.

An Area of Concern (AOC) is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine or non-systematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The list and description of the SWMUs and AOCs in the report may not be all inclusive. Furthermore, the fact that a SWMU was not identified in the report does not affect U.S. EPA's authority for corrective action for SWMUs which may not be contained in the report.

The central purpose of an RFA is to identify releases or potential releases requiring further investigation. According to EPA's RFA Guidance Document, the four purposes of an RFA area as follows:

1. To identify and gather information on releases at RCRA-regulated facilities.
2. To evaluate SWMUs and other AOCs for releases to all media and to evaluate regulated units for releases to media other than groundwater.
3. To make preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility.
4. To screen from further investigations those SWMUs that do not pose a threat to human health and the environment.

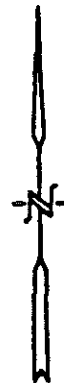
Design Original, Inc. is a silk screen printing company located at 402 Jackson Street, Jackson Center, Ohio in Shelby County (see Figures 1 and 2) (10). The company is owned by Frank Pusey and employs approximately 18-20 people. Design Original has utilized toluene, sodium hydroxide, and ink in its printing process (2). The facility generates small quantities of waste, and no longer uses toluene. Proper characterization of the waste has not yet been reported to the U.S. EPA or Ohio Environmental Protection Agency (Ohio EPA). If the industrial process wastes generated are hazardous, the facility generates this waste at a rate equivalent to that of a Conditionally Exempt Small Quantity Generator (less than 100 kilograms per month) (8). If the industrial process wastes generated are nonhazardous, then the facility is not a generator.

Samples from 55-gallon drums and buckets indicated the presence of toluene and sodium hydroxide, both potentially hazardous wastes. A soil sample taken at the alleged disposal area contained elevated levels of toluene (4), the only contaminant found to be present. The reported toluene concentration in that sample was 4.7 percent (19).

ERM-Midwest, Inc. was hired to develop and prepare a contamination assessment plan for the facility. Although it has been documented that dumping occurred in the area adjacent to the west side of the facility, it is unknown if dumping also occurred elsewhere in the vicinity of the facility. During February 1990, ERM collected samples in the alleged disposal area. Soil samples taken at a depth of 0 to 10 inches exhibited toluene contamination of 86 mg/kg on a dry weight basis. ERM developed and submitted an assessment plan to OEPA based on



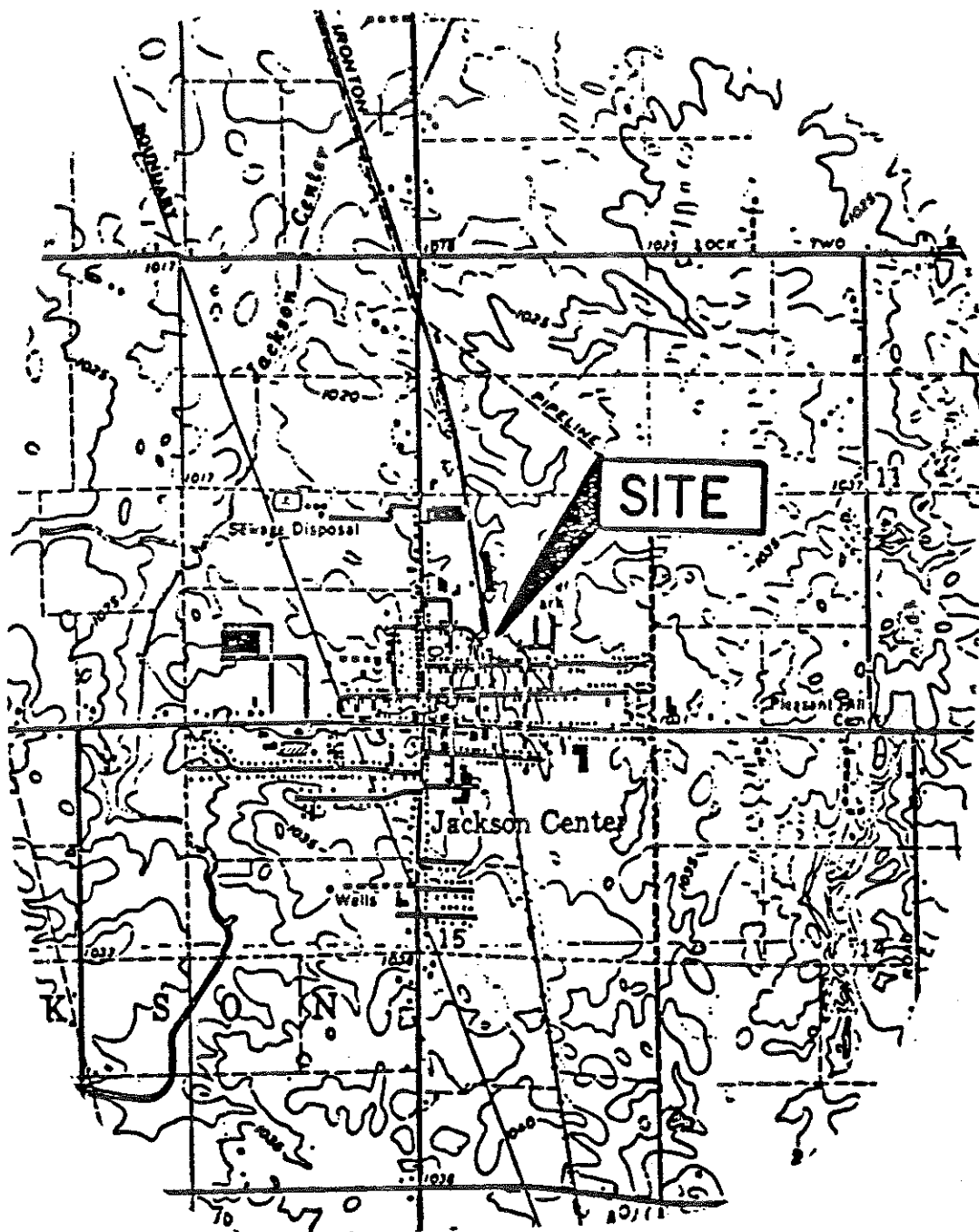
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Ohio County Map
Shelby County
Design Originals, Inc.

Project Number
150043-0009-626

Figure 1



Not to Scale



Location of Design Originals, Inc.
Jackson Center, Ohio

Source: Jackson Center Quadrangle, 7.5 Minute Series

Project Number
150043-0009-626

Figure 2

eyewitness reports of spilling activity. Sample coverage was limited by Mr. Pusey's available financial resources.

M&E performed a review of the Design Originals, Inc. files at the OEPA offices located in Dayton, Ohio, and of the U.S. EPA Region V RCRA files located in Chicago, Illinois. Files at the Air Pollution Group of the Portsmouth City Health Department were also reviewed. One SWMU, (Dumping Site), and one Area of Concern, (Present Waste Disposal Area) were tentatively identified based on the file review.

M&E performed the VSI on August 30, 1990 to verify the existence of the SWMU and to identify any other possible SWMUs or Areas of Concern. The M&E inspection team consisted of Lisa Allinger (Senior Environmental Scientist) and Steven Hulett (Geologist). Inspection personnel were met by Frank Pusey, President of Design Original, Inc., and Doug Wagner, Senior Project Geologist, of ERM-Midwest, Inc. Based on the VSI, only one additional SWMU, (Dumpster Area), was added to the one SWMU already identified (see Table 1). An Area of Concern identified during the PR pertains to both how the waste is presently collected (a one gallon plastic bucket with a lid is used as needed until full and then is placed into a 55-gallon drum) and how it will eventually be disposed of. However, the currently generated wastes (e.g., haze remover, ink, Aeroflex Bio-wash) have not been determined to be hazardous substances (toluene is no longer used).

1.2 Permit History

No Part A or Part B permits have been submitted for this facility. Design Original is considered a Land Disposal Facility.

1.3 Enforcement History

Design Original, Inc. was indicted on 34 criminal charges of violating Ohio hazardous-waste laws on September 27, 1988. Multiple indictments were issued against four company officials and 9 indictments were issued against the corporation. The corporation and four officials were scheduled to be arraigned in Shelby County Common Pleas Court on October 6, 1988, on charges that included illegal disposal of hazardous waste. The charges were initiated by the Ohio EPA and the Attorney General's Office (AGO) as evidence became available of illegal disposal of toluene on the Design Original, Inc. property (4). Evidence was initially obtained from a former employee of the facility on September 14, 1987 (1). Additional evidence was obtained on September 17, 1987 when personnel from Ohio EPA's Surveillance and Enforcement Section (now the Inspection and

TABLE 1
DESIGN ORIGINAL, INC.
SUMMARY OF SOLID WASTE MANAGEMENT UNITS

Unit Name	<u>Regulatory Status</u>	
	Before VSI	After VSI
Dump Site of Silk Screen Cleaning Waste	SWMU	SWMU
Dumpster Area	Unknown	SWMU
Present Disposal of Waste	Area of Concern	Area of Concern

Enforcement Program) and the Attorney General's Bureau of Criminal Investigation, along with a Shelby County Deputy, executed a criminal search warrant at Design Original for the purpose of obtaining samples confirming the presence of the hazardous waste.

Design Original, Inc. was designated a Land Disposal Facility because of its hazardous waste disposal activities (9). The Ohio EPA performed an inspection on September 7, 1989 to determine the status and compliance of the facility with Ohio's Hazardous Waste Rules. The results of this inspection indicated that Design Original, Inc. was in violation of several Rules of the Ohio Administrative Code (13 and 14). Violations included failure to submit a Part A application, waste analysis and waste analysis plan, inspection plan, contingency plan, operating record, annual report, closure plan, post-closure plan, landfill requirements and lack of personnel training and security. The inspection also helped to complete a Comprehensive Ground Water Monitoring Evaluation (CME), which is intended to determine a facility's compliance with applicable groundwater monitoring requirements. A CME of Design Original, Inc. was produced by the Ohio EPA on September 27, 1989 (10) revealing that a groundwater monitoring system does not exist at the facility.

Litigation was brought against Design Original, Inc. Four of its officials pleaded guilty to illegal disposal of hazardous waste and falsification of records (12). Frank Pusey, president of Design Original, Inc., was sentenced to 120 days in the Shelby County Jail and was available for work release by mid-February 1990 (17). Design Original, Inc. contracted outside environmental consulting services to assist in complying with the regulations mentioned (15). Further site evaluation was scheduled to begin in mid-February 1990 when Frank Pusey became available for work release and was physically able to provide assistance (17).

On June 15, 1990, the Ohio EPA informed Design Original, Inc. of its violation in failing to provide costs estimates for closure and post-closure, financial assurance for closure and post-closure care and liability coverage (20). On June 28, 1990, a response was prepared on behalf of Design Original claiming that the facility was not a Treatment, Storage, or Disposal (TSD) facility and that they were working with the district office to agree upon a remediation plan (21).

1.4 Project Description and Report Format

This RFA report consists of six sections and three appendices. The information contained in the report is designed to give the reader a thorough description of site-specific and area conditions at the facility, and to provide information on individual SWMUs and AOCs at the site. The following sections of the report are outlined below.

Section 2.0 describes the facility and its operations by providing general facility information, process information, waste management practices, and regulatory status of SWMUs at the site.

Section 3.0 provides information on the general environmental setting in the immediate area and in the region where the facility is located. The climate, surface water, groundwater, soils, geology, and land use in the vicinity of the site are described in this section.

Section 4.0 presents unit-specific information on SWMUs including: SWMU description, status, waste type(s) and management, evidence of releases, summary of remedial actions, and suggested actions are provided.

Section 5.0 provides a summary and recommendations, including a summary table for all SWMUs and AOCs identified during the RFA.

Section 6.0 provides conclusions including potential for releases for each SWMU and AOC.

Finally, the three Appendices contain the VSI photograph log, a copy of the VSI field logbook, and Material Safety Data Sheets.

2.0 GENERAL DESCRIPTION OF FACILITY AND PROCESSES

Section 2 includes a general description of the facility, its processes, and the environmental setting of the facility. A discussion of pollutant releases to the groundwater, surface water, air, soil and subsurface gases, and available monitoring and potential receptors is included.

2.1 Facility Location and Operation

Design Original, Inc. is a silk screen printing company located at 402 Jackson Street, Jackson Center, Shelby County, in west central Ohio (see Figure 2) (10). Known process materials are sodium hydroxide and ink. Known waste materials are haze remover, ink liquids sludges and spent filters (4). The facility generates a very small quantity of these wastes which have not yet been properly characterized. The amount of waste generated is equivalent to a Conditionally Exempt

Small Quantity Generator (less than 100 kilograms per month) (8). The facility no longer uses toluene in its processes. This toluene waste still remains where it was dumped on-site.

3.0 ENVIRONMENTAL SETTING

Design Original is located in a residential/commercial area surrounded by a rural agricultural setting. The Village of Jackson Center, where the facility is located, has a population of approximately 1,310 residents (29).

This section describes the environmental setting of the Design Original, Inc. facility including a description of the geology, hydrogeology, and climate/meteorology of the west central Ohio area in which it is located.

3.1 Geology

Jackson Center, Ohio is located in the Till Plains section of the Central Lowlands Province, with slight to moderate topography. Runoff in this locality drains into the Upper Great Miami River Basin. The topography of Shelby County is characterized by broad, level to moderately steep till plains and moraines, which are dissected by the Great Miami River and its tributaries. Generally the topography is gentle; however, along stream valleys and deposits of kames and moraines, slopes are steep and irregular. The highest point in Shelby County, found in its southeast corner, is 1150 feet above sea level; and the lowest point, located in south central Shelby County, is 870 feet above sea level (10).

Design Original, Inc. is situated on the Blount Silt loam soil. This poorly drained soil overlies broad areas on till plains and moraines, with a slope of 0-2 percent. The soil is characterized by a moderately deep root zone, low permeability and a moderate available water capacity. During the winter and spring, the soil typically exhibits a high perched water table (10).

The Wisconsin stage glaciation dominated the glacial deposits left in Shelby County. Only Wisconsin age till and outwash are observed. The only known outcrop of bedrock is a small band of Brassfield Limestone of Silurian Age. West of Jackson Center, the Wisconsin glacier filled in the Teays drainage system with glacial outwash and till. The Teays drainage system was the main system of drainage during the late Tertiary period (10).

The majority of glacial deposits found in Shelby County are till. This material is composed of silty clays with thin silt and sand lenses containing varying amounts of pebbles, cobbles, and boulders. The till cover of eastern Shelby County contains many large boulders and is known as the boulder belt. The Shelby County till was deposited mainly as end and ground moraines. The ground and end moraine deposits overlie a second till which contains pebbles and boulders. These thick strata overlie a thick crossbedded gravelly outwash. The interface between the till and the outwash is the stratigraphic position of what is thought to be a regionally developed paleosol horizon. Below the crossbedded outwash is a thick sandy clayey till which overlies a deeper sand and gravel. The thickness of the outwash deposits narrow with distance from the Great Miami River (10).

3.2 Hydrogeology

The bedrock aquifer is the largest producer in the Jackson Center area. This aquifer is composed primarily of fractured dolomite. The Ohio Department of Natural Resources (ODNR) reports that wells terminated in this water bearing zone can produce more than 150 gallons per minute (10). Although the bedrock aquifer is the largest producing zone, outwash deposits of sufficient size and permeability to provide an adequate supply of groundwater do exist locally. Well logs registered with ODNR showed 13 wells located within one half mile of the Design Original facility (10). Of these 13 wells, only two were completed to bedrock, and the remaining wells were screened in the local sand and gravel deposits. Pumping rates are reported to be between 6.5 and 300 gallons per minute depending upon well construction and depth (10).

Local stratigraphy is glacial till which contains alternating layers of sand and gravel. Strata range in thickness from several feet to tens of feet. Static water levels of the above-mentioned wells were reported to range between 5 and 110 feet, with most of the levels falling between 14 and 22 feet.

3.3 Climate/Meteorology

Jackson Center is located in a humid temperate continental type climate, which favors physical and chemical weathering and biological activity in the formation of soils. The average temperature here is 28 degrees F in the winter and 72 degrees F in the summer (10).

The average total precipitation is 20 inches per year, 55 percent of which occurs between April and September (10). Precipitation in the winter is usually in the form of snow, with an average total accumulation of 36 inches. Though precipitation events are usually moderate, tornadoes and severe thunderstorms occur occasionally, but are usually local and of short duration (10).

3.4 Pollutant Releases into Groundwater

Pollutant releases into groundwater include documented releases reported by facility personnel, and possible undocumented releases of process and waste materials. Documented releases include waste toluene, haze remover and ink material (1, 2 and 4). Other wastes that could have been released include additional toluene, haze remover, ink, sodium hydroxide, sludge and other process and waste materials which may have been released from drums, buckets, silk screens and silk screen cleaning operations (4).

3.4.1 Monitoring Data

No groundwater monitoring wells are present at the Design Original, Inc. facility, and no continuous monitoring data is available. Characterization of the facility's waste and the development of groundwater monitoring wells has been requested by the Ohio EPA, but had not been provided as of the VSI.

3.4.2 Potential Receptors

There are 13 documented residential or municipal drinking water wells located within a half mile radius of the Design Original, Inc. facility. The groundwater flow direction is not known. A determination as to up or downgradient status of these wells has not been made. These wells have reported pumping rates between 6.5 and 300 gallons per minute. The municipal water supply for Jackson Center is obtained exclusively from three wells located approximately 2000 feet south of the intersection of Route 65 and Route 274 (10). These wells appear to be approximately 3000 feet south-southwest of the Design Original, Inc. facility. The 3 municipal water supply wells (1, 2 and 3) were completed to 80, 54 and 186 feet, and pump at rates of 200, 150 and 150 gallons per minute respectively. Not knowing the groundwater flow direction, all 13 wells are potential receptors for contaminants released into the groundwater at the Design Original, Inc. facility. Local undocumented wells, Jackson Center Creek, the Great Miami River, springs, seeps and other surface water bodies may also be potential receptors for contaminants released into the groundwater at the Design Original, Inc. facility (10).

3.5 Pollutant Releases into Surface Water

Potential releases into surface water could result from the outfalls or runoff of process materials or wastes.

3.5.1 Monitoring Data

No monitoring data is available for surface water for the Design Original, Inc. facility.

3.5.2 Potential Receptors

Potential receptors include Jackson Center Creek, the Great Miami River, which has many recreational uses, and the people and biota that come in contact with these waterways. Jackson Center's population was 1,310 in 1980.

3.6 Pollutant Releases into Air

The potential sources of release into the air are vapors from volatile liquids, such as Aeroflex Bio-wash, paint thinner, haze remover and stencil remover (ICC Product 833 emulsion), which are used in and produced by the facility's process.

3.6.1 Monitoring Data

No monitoring data is available for air releases for the Design Original, Inc. facility.

3.6.2 Potential Receptors

Potential receptors include the 18-20 site employees, local biota and residents of the area.

3.7 Pollutant Releases into Soils

Potential pollutant releases into the soils include waste material from the cleaning of silk screens, which was dumped directly onto the soils (12).

3.7.1 Monitoring Data

Soil samples taken from Design Original, Inc. by Ohio EPA and the Attorney General's Office personnel during a sampling event on September 17, 1987, under a criminal search warrant, contained 47,000 ppm of toluene by weight (2 and 4). These samples were taken from the area where the silk screen cleaning waste was dumped (4). There is no documentation of the exact sampling location. ERM-Midwest, Inc. collected two samples adjacent to the stained western wall of the building in February 1990 to confirm the presence of toluene (19). One sample was taken 2 feet from the stained wall at a soil depth of 0 to 10 inches (Figure 3). Toluene was reported in that sample at a concentration of 86 ppm on a dry weight basis. The second sample was collected approximately one foot from the stained wall and angled toward the wall. The soil depth was 0 to 8 inches. Toluene was reported at a concentration of 18 ppm on a dry weight basis (19).

3.7.2 Potential Receptors

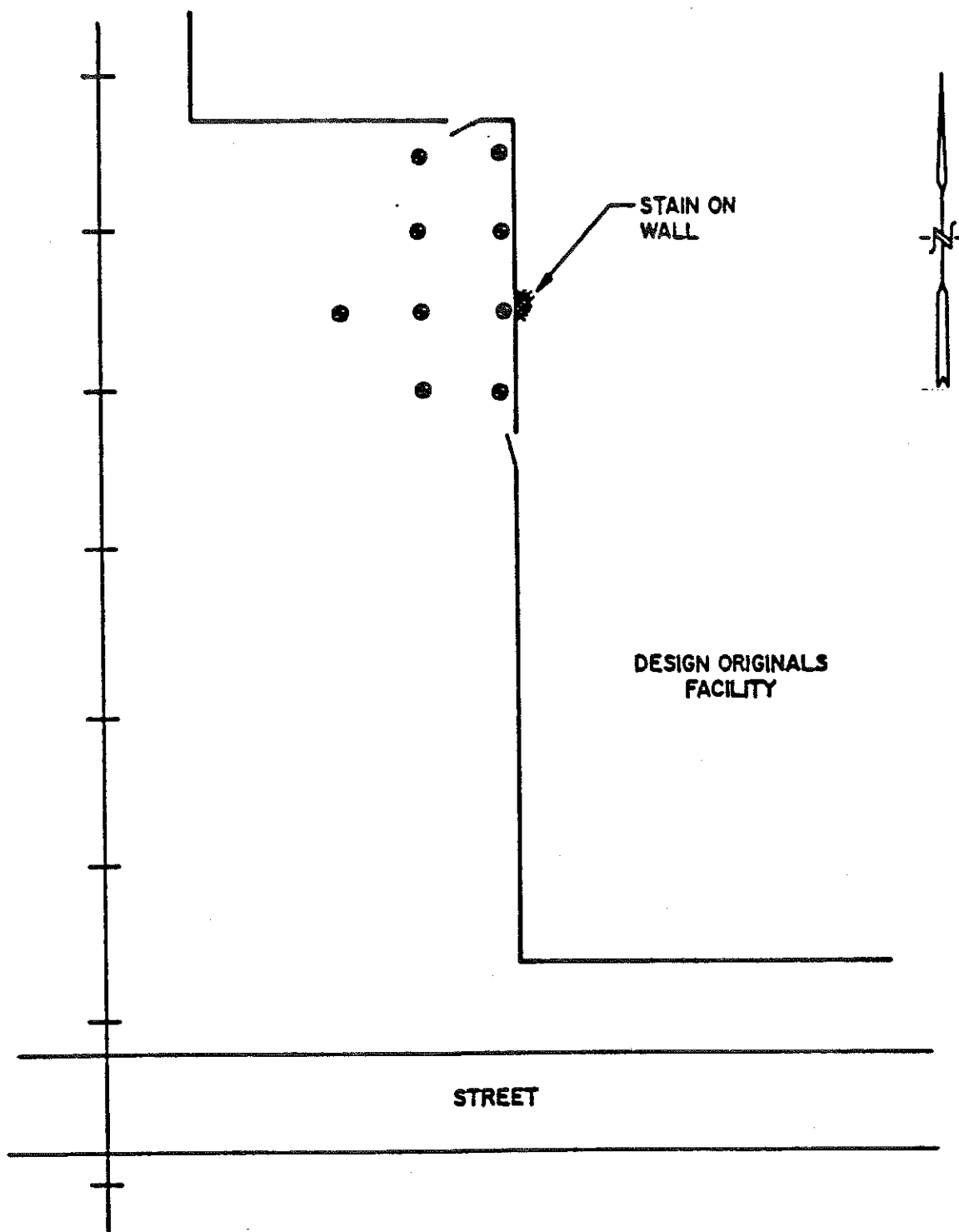
Soil around the facility where screens and screen cleaning waste was dumped is a receptor of the toluene, haze remover, and ink waste material (2 and 4). The biotic community supported by the soil is a potential receptor for the contaminants. Surface water could transport contaminants. Also, the aquifers could become contaminated, thus possibly impacting the people who use the aquifer as a water supply. The area is commercial/residential with a local population of approximately 1,310 (29). There are no fences or barriers to prevent access to the facility.

3.8 Releases of Gaseous Pollutants into Subsurface Soils

Releases of gaseous pollutants into subsurface soils may occur as the toluene, ink compounds, haze remover and other materials in the silk screen cleaning waste that was dumped on the ground infiltrates and volatilizes. The potential for other releases of gases into soils is very low. No soil gas monitoring has been conducted.

3.8.1 Monitoring Data

No soil gas monitoring has been conducted.



Not to Scale



Site Map - Solid Waste Management Units
Design Originals, Inc.
Source: ERM-Midwest, Inc. - Contamination Assessment Plan
April 24, 1990

Project Number
150043-0009-626

Figure 3

3.8.2 Potential Receptors

One potential receptor for subsurface gas contaminants is the ambient air, if the gases migrate to the surface and are released from the soil.

4.0 DESCRIPTION OF SOLID WASTE MANAGEMENT UNITS (SWMUs)

This section contains the file review information that has been subsequently modified and supplemented as a result of the VSI and by telephone calls with facility representatives.

4.1 Unit Type: Dumping Site of Silk Screen Cleaning Waste.

Regulatory Status: SWMU. The unit is considered an unpermitted, unlicensed land disposal facility (8). It is shown on Figure 3.

- A. Unit Description: The dumping site is located somewhere on the ground outside the facility (4). The exact location(s) and extent have yet to be determined. According to Frank Pusey of Design Original, the area was outside the western wall adjacent to the building. He claimed to have interviewed employees to determine the exact location. Both Frank Pusey and Doug Wagner, of ERM-Midwest, Inc., feel it is a confined location. Thus, ERM is proposing to sample in a limited area, based on this claim and the limited financial reserves of Frank Pusey (See Photograph 1 in Appendix A - area to right of people and behind dog in photograph is to be sampled).
- B. Age: 6 years
Period of Operation: It is believed that the waste was dumped at the site over the 3 year period between October 1984 and September 1987 (7).
- C. Waste Description: Although the waste has not been properly characterized, sampling results indicate the waste consists primarily of toluene (2). The waste has also been reported to contain haze remover, ink and sludge (4). Doug Wagner mentioned that the ink/paint contained lead (Pb) and chromium (Cr).
- D. Release Controls: The releases of the silk screen cleaning waste were intentional (12). No release controls were implemented.

- E. **Release History:** It is believed that the waste was dumped at the site over the 3 year period between October 1984 and September 1987 (7). The alleged dumping area is outside the door located at the western side of building, as portrayed in Photograph 2, Appendix A.
- F. **VSI Observations:** The area which allegedly was the site of dump has been covered by gravel. No surface water appears to be nearby. Frank Pusey and Doug Wagner pointed out locations which had been sampled (No. 1 in Figure 3). They stated that a shed that was used to store the toluene waste material stood adjacent to the western doorway by the stained wall where dumping occurred. It has been removed (See Photograph 2 in Appendix A - the shed was located where there is a yellow or unpainted area of wall, just left of the building's doorway). Also, ERM has not sampled or tested for ink components such as lead or chromium.
- G. **Sampling Results:** Doug Wagner provided M&E with a copy of ERM-Midwest, Inc.'s Contamination Assessment Plan (April 24, 1990) that contains copies of the lab results for their samples (19), which are discussed in Section 2.6.2 of the plan.

4.2 Unit Type: Dumpster Area

Regulatory Status: SWMU. The dumpster area is shown on Figure 3.

- A. **Unit Description:** There is one dumpster located (approximately 100 to 200 feet) west of the area where the waste was dumped outside the western wall of the building (See Photograph 3 in Appendix A).
- B. **Age:** Unknown. Possibly 9 years.
Period of Operation: Possibly since September 1981.
- C. **Waste Description:** Until the facility stopped using toluene in early 1988, this waste was put into the dumpster. It included cleaning rags, in addition to drums and sludge according to Frank Pusey.
- D. **Release Controls:** None.
- E. **Release History:** According to Frank Pusey, disposal of waste rags and other waste occurred during the period the toluene solvent was used.

F. VSI Observations: The dumpster appears to be located in close proximity to the dumping area. Frank Pusey and Doug Wagner are planning to sample only where employees claimed they saw dumping occur. It is feasible that dumping or releases occurred in other areas adjacent to or away from the building. Those areas have not been sampled.

G. Sample Results: None.

4.3 Area of Concern: Present Disposal of Waste

Regulatory Status: Area of Concern. This unit has been classified as an Area of Concern because it has yet to be determined whether the waste is characteristically hazardous, contains listed solvents, or is non-hazardous. See Figure 3 for location of this area.

A. Unit Description: Presently, the process of cleaning the screens uses a variety of solvents to which include ICC Product 757, ICC Product 833, ICC Product 840, Aeroflex Bio-wash and occasionally paint thinner. ICC 794 is presently being stored, but Frank Pusey was unsure whether it was an emulsion for inks or a substitute to replace ICC Product 833 (See Photograph 4, Appendix A). Doug Wagner suggested that Frank Pusey return the ICC Product 794, if he does not plan to use it.

B. Age: 9-10 years

Period of Operation: 1981 until present (toluene ceased to be used in September 1988).

C. Waste Description: The solvents are used in the following cleaning processes at the Design Originals facility.

1. Screens are scraped clean. Ink is kept and reused.
2. Screens are sprayed with ICC Product 840, an ink degrader, and the ink is scraped into 1 gallon buckets [MSDS sheet for ICC Product 240 (22)]. Once these buckets are full, they are placed in the DOT drum which is kept in the screen cleaning room (see Photograph 5, Appendix A). According to Doug Wagner, the flash point is 120°F and OSHA does not describe it as flammable. He said the MSDS sheets do not show it as hazardous. However, in his opinion it is a gray area and the material will be treated as potentially hazardous until it is determined to be nonhazardous.

3. Screens are sprayed with ICC Product 833 [MSDS sheet for ICC Product 833 (23)], an emulsion which is a stencil remover. This material is used in combination with water. This material is disposed of by washing it down a drain. This wastewater is sent to the Village of Jackson Center's POTW [MSDS sheet for ICC Product 833 (23)].
4. ICC Product 757 [MSDS sheet for ICC Product 757 (24)], a haze remover, is brushed onto the screens to eliminate the stain on the screen. It is then sprayed off into a tub and ultimately sent to the POTW.
5. Aeroflex Bio-wash [MSDS sheet for Bio-wash (25)] is used for cleaning the work area, washing off hands, and wiping down the screens. According to Frank Pusey, it is diluted with 20 percent water in order to extend its use. Doug Wagner of ERM-Midwest, Inc. does not feel that using it with ink is hazardous (Flashpoint 115 degrees F).

Some of the ink which is presently used is Wilflex Nupuff, Wilflex MP Ink and Wilflex SSV and SSV-FR Textile Inks [MSDS sheets (26, 27, and 28) (Photograph 6, Appendix A)]. Frank Pusey stated that he purchases paint thinner in very small quantities from local stores to use for cleaning purposes.

- D. Release Controls: The only release control is for the ICC Product 840, which is placed into a 1-gallon container. The 1-gallon container is then placed into a DOT drum when a sufficient amount accumulates. However, the 1-gallon container is handled with ungloved hands and is moved around the facility during use. There is no secondary containment except for the concrete floor (there are no floor drains in the room).
- E. Release History: The 1-gallon bucket sits anywhere it is convenient (e.g., a desk). However, the ICC Product 840 has not been determined to be hazardous and is being held on-site in the DOT drum, just in case the product is determined to be so.
- F. VSI Observations: The plastic gallon containers for ICC Product 840 are placed in the open for continuous use. Once filled with the material, the buckets are kept in a 55-gallon DOT drum. Frank Pusey has not removed any of this material since May 1988. He estimates the drum has an accumulation of about 12 gallons of this ICC Product 840 and ink. He will not use his EPA I.D. number to transport it for hazardous waste disposal because he considers it

non-hazardous. There was no container for used rags, gloves, etc. It should be noted that the employees, including Frank Pusey, do not use gloves to handle any of this material (Bio-wash is a skin irritant).

Note: The wastes have not been characterized properly and the potential exists that this and other wastes exhibit one or more RCRA hazardous characteristics (i.e., ignitability), and/or may contain listed solvents.

G. Sample Results: None.

5.0 SUMMARY AND RECOMMENDATIONS

The principal environmental concerns at the Design Original, Inc. facility are soil and groundwater contamination associated with the previous dumping of toluene and ink onto the ground. This dumping has contaminated the outside of the western side of the facility building, and the area of the dumpster, which was used for contaminated rags, drums and sludge. The dumpster is located west of the dumping area that was found to be contaminated. An Area of Concern is the disposal of presently used waste (solvents and ink). Listed below are the recommended sampling points, parameters for analysis and other actions necessary to complete the unit investigation.

1. Dump Site of Silk Screen Cleaning Waste - recommend soil and groundwater sampling. Analytical parameters should include all compounds listed on the U.S. EPA Contract Laboratory Program's Target Compound List. Excess concentrations of toluene have already been identified. Metals from pigments are of concern (4 and 19).
2. Dumpster Area - recommend soil and groundwater sampling. Analytical parameters should include all compounds listed on the U.S. EPA Contract Laboratory Program's Target Compound List. Excess concentrations of toluene have already been identified. Metals from pigments are of concern (4 and 19).
3. It should be confirmed whether the present solvents and inks used in the screen cleaning process are hazardous or non-hazardous wastes. ICC Product 840 and some ink/paint residuals are being stored as hazardous wastes while the remaining material is being discharged into the Village of Jackson Center POTW. Some of the products in the waste exhibit ignitability below the D001 140° F limit. Therefore, at a minimum the wastes need to be analyzed for that characteristic code.

Table 2 lists all SWMUs and AOCs, operational dates, release history and suggested further action.

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DATE _____
RIN # _____
INITIALS WV

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CONFIDENTIAL

TABLE 2
DESIGN ORIGINAL, INC.
SOLID WASTE MANAGEMENT UNITS SUMMARY

Solid Waste Management Unit	Operational Dates	Release History	Suggested Further Action
Dump Site of Silk Screen Cleaning Waste	Possibly October 1984 to September 1987	Possibly October 1984 to September 1987	Soil and Groundwater Sampling
Dumpster Area	Possibly October 1984 to September 1988	Possibly October 1984 to September 1987	Soil and Groundwater Sampling
Present Disposal of Waste	September 1988 until Present	Unknown	Sample Waste to Determine if Hazardous

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RELEASED
DATE 4/9/01
RIN #
INITIALS JV

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6.0 CONCLUSIONS

The PR/VSI identified 2 SWMUs and 1 Area of Concern at the Design Originals, Inc. facility. Background information regarding the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting and receptors is presented in Sections 2.0 and 3.0. SWMU specific information such as the unit's description, dates of operation, wastes managed, release controls, release history and observed conditions is discussed in Section 4.0.

The following discussion summarizes the environmental concerns at the facility. Table 2 identified the SWMU's and AOCs at the Design Originals facility and suggested further actions.

SWMU 1 - Dump Site of Silk Screen Cleaning Waste

This unit is considered an unpermitted, unlicensed land disposal facility.

The release of toluene, haze remover and ink waste has been documented. Toluene, haze remover and ink waste from cleaning silk screens were disposed of on the ground at the Design Original, Inc. facility. Up to 864 gallons of this waste has been unaccounted for over a 3 year period (4 and 7), some of which may have evaporated during use. There is the potential of a release to the groundwater if leaching occurs.

There is minimal potential of release to surface water during runoff. There is no documentation concerning release to any surface waters. No surface water appears to be present in the vicinity of the spill that could be immediately impacted by contact with contaminated surface soils.

The air could be a receptor if the gases migrate through the soil to the surface or if the soil is disturbed (e.g, by excavation or construction).

There is potential for a release of subsurface gas if the material migrates through the soil.

SWMU 2 - Dumpster Area

This unit consists of one dumpster used for trash disposal. Waste toluene and ink sludge were disposed of with the company's trash. Questionable disposal of waste rags and other material into the company's dumpster raises the possibility of hazardous constituent leakage that could migrate into the soil and groundwater. Releases from the storage, handling and use of process materials and

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INITIALS WV

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waste materials also exhibit potential for migration into soil and groundwater. These materials may include toluene, ink, sodium hydroxide and ink sludge (2 and 4).

There is a potential for the soils beneath and adjacent to the dumpster area to be contaminated. This area is very close to the contaminated dumping area (possibly between 100 to 200 feet). Because the material disposed contained toluene and ink, it is probable that this area also is contaminated.

There is minimal chance for release to surface water because no surface water appears to be within the building vicinity. However, if surface water is present nearby, runoff of contaminated soil could possibly contaminate the water. Standing water that may pond could be contaminated from the contaminated surface soils.

The air could be a receptor if the gases migrate through the soil to the surface.

There may be some potential release of subsurface gas if material can migrate through the soil.

Area of Concern 1 - Present Disposal of Waste

This unit consists of one-gallon buckets carried by employees to where they are needed. Spent solvent from cleaning silk screens is placed in these buckets.

The wastes have yet to be characterized. There is a potential threat of contamination if lead and chromium or other metals are constituents of the pigment in the ink or paint. There is a potential for release to the soils if the material is spread by employee footwear or it is swept outside.

The wastes have yet to be characterized. The material is discharged to the POTW via the drains in the cleaning tubs. The facility has no permit to discharge this material. They completed a form sent to industrial facilities from the Village of Jackson Center POTW, on which the facility was to provide the types and amounts of material that they discharge to the POTW. At the time, they were using Big Orange (no details or MSDS sheets were provided for this substance).

The potential for a surface water release depends on the handling, disposal, storage, engineering and process techniques utilized at the Design Original, Inc. facility. Surface runoff from past illegal dumping of silk screen cleaning waste presents the potential for pollutant releases into surface water. Releases may also have the potential to flow into floor drains and storm sewers and could be transported to the Jackson Center Sewage Disposal facility and discharged into Jackson Center

ENFORCEMENT
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Creek. Spill control and decontamination equipment are tested and maintained as required by law and help to lower the release potential for surface water releases (8).

There is a strong odor of solvents throughout the building particularly in closed rooms. There is potential for release to air whether the material is hazardous or non-hazardous. Vapors from cleaning silk screens have been released in past screen cleaning activities. These releases consist primarily of toluene and may be of large enough magnitude to be considered a health hazard (4). Ink waste has been stored in open containers and may also emit volatile components into the air (8).

There is a low potential for release of subsurface gas.

RELEASED
DATE 4/9/01
RIN #
INITIALS

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APPENDIX A

Visual Site Inspection Photograph Log



DOG

PHOTOGRAPH 1: Area where known dumping has occurred (right portion of photo).
Date: August 23, 1990



DOG

PHOTOGRAPH 2: Area where dumping was confirmed. Old shed where toluene was stored was located to the left of building entrance.
Date: August 23, 1990



PHOTOGRAPH 3: Dumpster area.
Date: August 23, 1990



PHOTOGRAPH 4: Solvents used in screen cleaning process.
Date: August 23, 1990



PHOTOGRAPH 5: Drum used to store present waste (yet undetermined if hazardous).
Date: August 23, 1990



PHOTOGRAPH 6: Inks used at facility.
August 23, 1990

APPENDIX B

Copy of Log Book Used During VSI

Log Book #63

Return to:

Metcalf & Eddy, Inc.
2800 Corporate Exchange Drive
Suite 250
Columbus, OH 43221
614-890-5501

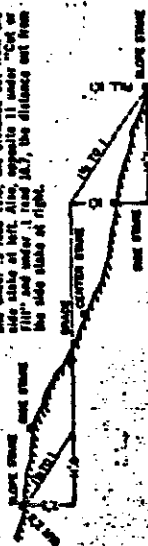
150043-0009-626
Design Originals

"Kitt in the Rain"
The paper in this book has been treated
by an exclusive chemical waterproofing
process. Wet or dry, even the hardest
pencil will produce a clean, sharp mark.

KEUFFEL & ESSER CO.

DISTANCES FROM SIDE STAKES FOR CROSS-SECTIONING

Readings of any Width, Side Slopes 1 1/2 to 1.
In the figure below opposite 7 under "Cut or Fill"
and under 3 read 11.6, the distance out from the
side stake of left. Also, opposite 11 under "Cut or
Fill" and under 1 read 23.7, the distance out from
the side stake of right.



Cut or Fill	Distance out from Side or Shoulder Stake										Cut or Fill
	0	1	2	3	4	5	6	7	8	9	
0	0.0	0.2	0.3	0.5	0.6	0.8	0.9	1.1	1.2	1.4	0
1	1.5	1.7	1.8	2.0	2.1	2.3	2.4	2.6	2.7	2.9	1
2	3.0	3.2	3.3	3.5	3.6	3.8	3.9	4.1	4.2	4.4	2
3	4.5	4.7	4.8	5.0	5.1	5.3	5.4	5.6	5.7	5.9	3
4	6.0	6.2	6.3	6.5	6.6	6.8	6.9	7.1	7.2	7.4	4
5	7.5	7.7	7.8	8.0	8.1	8.3	8.4	8.6	8.7	8.9	5
6	9.0	9.2	9.3	9.5	9.6	9.8	9.9	10.1	10.2	10.4	6
7	10.5	10.7	10.8	11.0	11.1	11.3	11.4	11.6	11.7	11.9	7
8	12.0	12.2	12.3	12.5	12.6	12.8	12.9	13.1	13.2	13.4	8
9	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	14.9	9
10	15.0	15.2	15.3	15.5	15.6	15.8	15.9	16.1	16.2	16.4	10
11	16.5	16.7	16.8	17.0	17.1	17.3	17.4	17.6	17.7	17.9	11
12	18.0	18.2	18.3	18.5	18.6	18.8	18.9	19.1	19.2	19.4	12
13	19.5	19.7	19.8	20.0	20.1	20.3	20.4	20.6	20.7	20.9	13
14	21.0	21.2	21.3	21.5	21.6	21.8	21.9	22.1	22.2	22.4	14
15	22.5	22.7	22.8	23.0	23.1	23.3	23.4	23.6	23.7	23.9	15
16	24.0	24.2	24.3	24.5	24.6	24.8	24.9	25.1	25.2	25.4	16
17	25.5	25.7	25.8	26.0	26.1	26.3	26.4	26.6	26.7	26.9	17
18	27.0	27.2	27.3	27.5	27.6	27.8	27.9	28.1	28.2	28.4	18
19	28.5	28.7	28.8	29.0	29.1	29.3	29.4	29.6	29.7	29.9	19
20	30.0	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.2	31.4	20
21	31.5	31.7	31.8	32.0	32.1	32.3	32.4	32.6	32.7	32.9	21
22	33.0	33.2	33.3	33.5	33.6	33.8	33.9	34.1	34.2	34.4	22
23	34.5	34.7	34.8	35.0	35.1	35.3	35.4	35.6	35.7	35.9	23
24	36.0	36.2	36.3	36.5	36.6	36.8	36.9	37.1	37.2	37.4	24
25	37.5	37.7	37.8	38.0	38.1	38.3	38.4	38.6	38.7	38.9	25
26	39.0	39.2	39.3	39.5	39.6	39.8	39.9	40.1	40.2	40.4	26
27	40.5	40.7	40.8	41.0	41.1	41.3	41.4	41.6	41.7	41.9	27
28	42.0	42.2	42.3	42.5	42.6	42.8	42.9	43.1	43.2	43.4	28
29	43.5	43.7	43.8	44.0	44.1	44.3	44.4	44.6	44.7	44.9	29
30	45.0	45.2	45.3	45.5	45.6	45.8	45.9	46.1	46.2	46.4	30
31	46.5	46.7	46.8	47.0	47.1	47.3	47.4	47.6	47.7	47.9	31
32	48.0	48.2	48.3	48.5	48.6	48.8	48.9	49.1	49.2	49.4	32
33	49.5	49.7	49.8	50.0	50.1	50.3	50.4	50.6	50.7	50.9	33
34	51.0	51.2	51.3	51.5	51.6	51.8	51.9	52.1	52.2	52.4	34
35	52.5	52.7	52.8	53.0	53.1	53.3	53.4	53.6	53.7	53.9	35
36	54.0	54.2	54.3	54.5	54.6	54.8	54.9	55.1	55.2	55.4	36
37	55.5	55.7	55.8	56.0	56.1	56.3	56.4	56.6	56.7	56.9	37
38	57.0	57.2	57.3	57.5	57.6	57.8	57.9	58.1	58.2	58.4	38
39	58.5	58.7	58.8	59.0	59.1	59.3	59.4	59.6	59.7	59.9	39
40	60.0	60.2	60.3	60.5	60.6	60.8	60.9	61.1	61.2	61.4	40

M & E covers onsite at

0950

Doug Wagner

conducted, but not from
a TSD stand point.

Met with ERM &

Frank E. Bussey - Pres.

ERM ash definition of solid

Waste Management Unit.

said the only one identified
was the dumping area.

ERM & F. Bussey said

they got a document

discussing waste generation
status.

in operation since May 1981

ERM informs them that

a closure plan will
be needed.

ERM discussion of design plan

spill location - area of shut
down.

18 soil samples - 9 location

0-1.5 ft & 1.5-3 ft.

D.O. view is that a

study & remediation plan

closure will be

if soil is contaminated ERM

will recommend further study.

ESM said it was determined
as one location of dumping.
Samples will be analyzed
for toluene.

Stopped using toluene in
early 1988.

Drum used on ink department,

840

Can # 100833

" " 100757

Intercontinental Chemical

corp. Can OK.

Brownish - Elephant Brand Co.

Once in a while use past
there.

MRE each what happens to
waste products

1) don't reuse

2) chd department is

removed off scene

& is dumped. Collect from

May 1988. 12 gal

period is a year & half

3) 833 sprayed on &

sprayed off with water

1 goes to POTW.

4) 757 sprayed on &

off with H₂O and

goes to POTW.

ERM says the issue is
if it is hazardous or not?
M & E ask about permit
for POTW.

ERM feels this is
not hazardous as
due to combinations of
chemicals & MSDS.
Some Wash 500 gal/day

Treat this waste as
hazardous until more
is resolved.
No MSDS & NO
permit for POTW, but
none required.

Biorack used a clean-up
for Machine & screens. Flash
pt 120° Related with
20% H₂O. ERM above and
feel with is hazardous waste.
11/10 Photo 1 & 2, 3, 4, 5
area.

Photo of depth tank stage
area.

Photo of area where dumping
occurred.

Planned sapling

10 ft. interval.

11:25 Photos of back of
plant where saplings
were taken. 'Saplings' occurred

APPENDIX C
Copy of Profile Sheets

FLEXIBLE PRODUCTS COMPANY
WILFLEX MP INK
MATERIAL SAFETY DATA SHEET
MAY 12, 1986

Each customer should study this Material Safety Data Sheet and become aware of the Product Hazards. Reference works or personnel who are expert on ventilation, toxicology and fire prevention/suppression may need to be consulted to adequately utilize the data contained in this Material Safety Data Sheet.

FLEXIBLE PRODUCTS COMPANY
(404) 428-2684 FOR EMERGENCY CALL CHEMTREC (800) 424-9300

FLEXIBLE PRODUCTS COMPANY
Vinyl Division
1007 Industrial Park Drive
Marietta, GA 30061

I. PRODUCT IDENTIFICATION

Product Name: Wilflex MP Ink
Product Number: All Colors
Chemical Name: Plastisol
Chemical Family: Polyvinyl Chloride Resin Dispersion
Molecular Weight: Mixture
Synonyms:

II. HAZARDOUS INGREDIENTS

In the paste or fused form (normal forms in which this product is handled), these materials should meet CFR1910.1200 requirements in that the user is not confronted with carcinogenic (.1%) or hazardous (1%) levels of ingredients used in the formulation. However Flexible Products Company has been advised to let the user know that in all the inks, fillers and pigments have been used which may result in nuisance particulates or a more serious hazard if openly incinerated, sanded, etc.

PRODUCT	COMPONENT	CAS #	ACGIH TLV ¹	PERCENT
All Colors	Calcium Carbonate	1317-65-3	10mg/m ³ total dust	>10%
White	Titanium Dioxide	13463-67-7	5mg/m ³ respirable dust	>10%
Blacks	Carbon Black	1333-86-4	3.5 mg/m ³	> 1%
Threshold Limit Value				

III. PHYSICAL DATA

Boiling Point.....: Greater than 500 Degrees F.
Vapor Density.....: Greater than 5.0.
(AIR=1)
Vapor Pressure.....: Less than 1×10^{-4} mm Hg.
@ 70 deg. F
Specific Gravity.....: Product range 1.0 - 1.4
@ 25 deg. C
Water Solubility.....: Negligible

IV. FIRE & EXPLOSION DATA

Flash Point.....: Greater than 400 Degrees F.

Extinguishing Media...: Dry Chemical (e.g. mono ammonium phosphate, potassium sulfate and potassium chloride), carbon dioxide, chemical foam or water spray.

Special Fire Fighting: Procedures: Full emergency equipment with self contained breathing apparatus. During a fire, acrid fumes and hydrogen chloride will be generated. Pressure can build up in drums and other closed containers exposed to temperatures found in fires. A cold water stream should be directed to cool fire exposed containers.

V. HEALTH AND SAFETY INFORMATION

Animal Testing Data - Most Toxic Component Only.

Oral LD ₅₀	30 gm/kg	Animal	rat
Dermal LD ₅₀	20 gm/Kg	Animal	rabbit
Inhalation LC ₅₀	Not determined	Animal	N/A

Skin	Severe	Moderate	X	Mild	Animal	Rabbit
Eye	Severe	Moderate	X	Mild	Animal	Rabbit

The above toxicological data on the individual components of the mixture summarizes the available supplier's Material Safety Data Sheets. Additive or synergistic effects of the components of this mixture have not been considered.

V. HEALTH AND SAFETY INFORMATION CON'T.

Human Effects

Inhalation...: Respiratory tract irritation if mists are inhaled. No chronic effects have been determined.

Skin.....: Generally regarded as non-irritating, non-fatiguing and non-sensitizing.

Eyes.....: Mild eye irritant.

Ingestion...: Can cause gastrointestinal irritation, nausea, vomiting and diarrhea.

VI. EMERGENCY FIRST AID PROCEDURES

EYE CONTACT.....: Flush with clean lukewarm water (low pressure) for at least 15 minutes. Obtain prompt medical attention.

SKIN CONTACT.....: Remove contaminated clothing. Wash affected areas thoroughly with soap and water. Wash contaminated clothing before reuse.

INHALATION.....: Remove to well ventilated area free from risk of further exposure. Treat symptomatically.

INGESTION.....: Do not induce vomiting. Keep person warm, quiet and get medical attention.

NOTE TO PHYSICIAN...: Aspiration of material into the lungs due to vomiting can cause chemical pneumonitis which can be fatal.

VII. EMPLOYEE PROTECTION RECOMMENDATIONS

EYE PROTECTION.....: Wear Safety glasses with side shields (or goggles).

SKIN PROTECTION.....: Chemical resistant gloves should be worn. Wash thoroughly after handling.

RESPIRATORY PROTECTION.....: An appropriate NIOSH approved respirator for organic vapor and mist must be worn if exposure is likely to exceed exposure limits (Section II). Observe OSHA regulations for respirator use (29CFR 1910.134).

VENTILATION.....: Good general ventilation must be used. Local exhaust ventilation may be needed to control air contamination below recommended exposure limits.

OTHER.....: Safety showers and eyewash stations should be available and clearly marked. Educate employees in the safe use of this product and related safety equipment.

VIII. REACTIVITY DATA

STABILITY.....: Stable under normal conditions

POLYMERIZATION.....: Hazardous polymerization will not occur

INCOMPATIBILITY.....: Strong oxidizing agents
(Materials to avoid)

HAZARDOUS DECOMPOSITION PRODUCTS.....: Acetic acid, hydrogen chloride, carbon monoxide, carbon dioxide by combustion.

IX. SPILL OR LEAK PROCEDURES

IF MATERIAL IS SPILLED OR RELEASED:

Spills should be absorbed on a suitable medium such as saw-dust, clay or filtercel and disposed of in compliance with federal, state and local environmental control regulations.

WILFLEX MP INK
MAY 12, 1986

IX. SPILL OR LEAK PROCEDURES CON'T.

WASTE DISPOSAL METHOD: Incineration is the preferred method. Again, check local, state and federal regulations for compliance procedures.

X. SPECIAL PRECAUTIONS AND STORAGE DATA

Storage Temperatures: Recommended below 100 Deg. F.

Storage Conditions: Do not store near flame, excessive heat, or strong oxidants.

NOTE:

The information contained herein is derived from information made available to Flexible Products Company through our suppliers. We believe the information to be current and as complete as available. Update will occur as increased information is made available to us. Since the use of the product and this information are not within the control of Flexible Products Company, it is the users obligation to determine the conditions of safe use of the product.

Prepared by: George A. Hart
Date: May 12, 1986
Supersedes: All Previous

FLEXIBLE PRODUCTS COMPANY
WILFLEX NUPUFF
MATERIAL SAFETY DATA SHEET
JANUARY 29, 1986

Each customer should study this Material Safety Data Sheet and become aware of the Product Hazards. Reference works or personnel who are expert on ventilation, toxicology and fire prevention/suppression may need to be consulted to adequately utilize the data contained in this Material Safety Data Sheet.

FLEXIBLE PRODUCTS COMPANY
(404) 428-2684 FOR EMERGENCY CALL CHEMTREC (800) 424-9300

FLEXIBLE PRODUCTS COMPANY
Vinyl Division
1007 Industrial Park Drive
Marietta, GA 30061

I. PRODUCT IDENTIFICATION

Product Name: Wilflex Nupuff
Product Number:
Chemical Name: Plastisols
Chemical Family: Polyvinyl Chloride Resin Dispersion
Molecular Weight: Mixture
Synonyms:

II. HAZARDOUS INGREDIENTS

In the paste or fused form (normal forms in which this product is handled), these materials should meet CFR1910.1200 requirements in that the user is not confronted with carcinogenic (.1%) or hazardous (1%) levels of ingredients used in the formulation. However Flexible Products Company has been advised to let the user know that in the white inks, a pigment has been used which may result in nuisance particulates or a more serious hazard if openly incinerated, sanded, etc.

<u>PRODUCT</u>	<u>COMPONENT</u>	<u>CAS #</u>	<u>ACGIH TLV¹</u>	<u>PEL</u>	<u>PERCENT</u>
White only	Titanium Dioxide	13463-67-7	.10mg/m ³ total dust	15 mg/m ³ total dust	>1%

¹Threshold Limit Value

III. PHYSICAL DATA

Boiling Point.....: >500 Deg. F
Vapor Density.....: >5.0
(AIR=1)
Vapor Pressure.....: non-volatile
@ 70 Deg. F
Specific Gravity.....: 1.1
@ 25 Deg. C
Water Solubility.....: Negligible

IV. FIRE & EXPLOSION DATA

Flash Point.....: 500 Degrees C.

Extinguishing Media...: Dry Chemical (e.g. mono ammonium phosphate, potassium sulfate and potassium chloride), carbon dioxide, chemical foam or water spray.

Special Fire Fighting: Procedures: Full emergency equipment with self contained breathing apparatus. During a fire, acrid fumes and hydrogen chloride will be generated. Pressure can build up in drums and other closed containers exposed to temperatures found in fires. A cold water stream should be directed to cool fire exposed containers.

V. HEALTH AND SAFETY INFORMATION

HUMAN EFFECTS

<u>Inhalation</u>	Respiratory tract irritation if mists are inhaled.
<u>Skin</u>	Generally regarded as a moderate skin irritant.
<u>Eyes</u>	Severe eye irritation.
<u>Ingestion</u>	Can cause gastrointestinal irritation, nausea, vomiting and diarrhea.

V. HEALTH AND SAFETY INFORMATION CON'T.

See Previous Page.

VI. EMERGENCY FIRST AID PROCEDURES

EYE CONTACT.....: Flush with clean lukewarm water (low pressure) for at least 15 minutes. Obtain prompt medical attention.

SKIN CONTACT.....: Remove contaminated clothing. Wash affected areas thoroughly with soap and water. Wash contaminated clothing thoroughly before reuse.

INHALATION.....: Remove to well ventilated area free from risk of further exposure. Treat symptomatically.

INGESTION.....: Can cause gastrointestinal irritation, nausea, vomiting and diarrhea. Consult a physician immediately.

VII. EMPLOYEE PROTECTION RECOMMENDATIONS

EYE PROTECTION.....: Wear Safety glasses preferably with side shields (or goggles).

SKIN PROTECTION.....: As with all chemicals, good industrial hygiene requires the use of chemically resistant gloves. Wash thoroughly after handling.

RESPIRATORY PROTECTION.....: An appropriate NIOSH approved respirator for organic vapor and mist must be worn if exposure is likely to exceed exposure limits (Section II). Observe OSHA regulations for respirator use (29CFR 1910.134)

VENTILATION.....: Good general ventilation must be used. Local exhaust ventilation may be needed to control air contamination below recommended exposure limits.

OTHER.....: Safety showers and eyewash stations should be available and clearly marked. Educate employees in the safe use of this product and related safety equipment.

VIII. REACTIVITY DATA

STABILITY.....: Stable under normal conditions

POLYMERIZATION.....: Hazardous polymerization will not occur

INCOMPATIBILITY.....: Strong oxidizing agents
(Materials to avoid)

HAZARDOUS DECOMPOSITION

· PRODUCTS.....: Acetic acid, hydrogen chloride, carbon monoxide, carbon dioxide by combustion.

IX. SPILL OR LEAK PROCEDURES

IF MATERIAL IS SPILLED OR RELEASED:

Small spills may be collected with absorbent materials.

Large spills may be shoveled into drums and disposed of in compliance with federal, state and local environmental control regulations. If incinerated, be aware that corrosive hydrogen chloride is generated.

IX. SPILL OR LEAK PROCEDURES CON'T.

WASTE DISPOSAL METHOD:

See Previous Page.

X. SPECIAL PRECAUTIONS AND STORAGE DATA

Storage Temperature.: Recommended below 85 deg. F.

Storage Conditions...: Do not store near flame, heat or strong oxidants.

NOTE: The information contained herein is derived from information made available to Flexible Products Company through our suppliers. We believe the information to be current and as complete as available. Updates will occur as increased information is made available to us. Since the use of the product and this information are not within the control of Flexible Products Company, it is the users obligation to determine the conditions of safe use of the product.

Prepared by: George A. Hart
Date: January 29, 1987
Supersedes: All Previous

Page 1 of 2

FLEXIBLE PRODUCTS COMPANY
AEROFLEX BIO-WASH
MATERIAL SAFETY DATA SHEET
JULY 8, 1987

Each customer should study this Material Safety Data Sheet and become aware of the Product Hazards. Reference works or personnel who are expert on ventilation, toxicology and fire prevention/suppression may need to be consulted to adequately utilize the data contained in this Material Safety Data Sheet.

FLEXIBLE PRODUCTS COMPANY
(404) 428-2684 FOR EMERGENCY CALL CHEMTREC (800) 424-9300

FLEXIBLE PRODUCTS COMPANY
Vinyl Division
1007 Industrial Park Drive
Marietta, GA 30061

I. PRODUCT IDENTIFICATION

Product Name: Aeroflex Bio-Wash
Product Number:
Chemical Name:
Chemical Family: Monocyclic terpene/nonyl phenol ethoxylate blend
Molecular Weight: Mixture
Synonyms:

II. HAZARDOUS INGREDIENTS

No TLV or PEL has been established for the mixture or the individual components by OSHA or the ACGIH.

III. PHYSICAL DATA

Density, liquid: 0.88 at 75 deg. F

Vapor Density.....: 4.7
(AIR=1)

Vapor Pressure.....: Negligible
@ 70 deg. F

Specific Gravity.....: .88
@ 75 deg. F

Water Solubility....: Emulsifies

1285 Less 10%

AEROFLEX BIO-WASH
JULY 8, 1987

IX. SPILL OR LEAK PROCEDURES CON'T.

WASTE DISPOSAL METHOD:

Incinerate in accordance with local, state, and federal regulations.

X. SPECIAL PRECAUTIONS AND STORAGE DATA

Storage Temperature..... Recommended below 120 Degrees F.

Storage Conditions..... Handle as a combustible liquid. Store away from heat and open flames. Store in sealed original containers in a cool dry area.

NOTE: The information contained herein is derived from information made available to Flexible Products Company through our suppliers. We believe the information to be current and as complete as available. Update will occur as increased information is made available to us. Since the use of the product and this information are not within the control of Flexible Products Company, it is the users obligation to determine the conditions of safe use of the product.

Prepared by: George A. Hart
Date: July 8, 1987
Supersedes: All Previous

AEKONLEX BIO-WASH
JULY 6, 1987

IV. FIRE & EXPLOSION DATA

Flash Point.....: 115 deg F

Extinguishing Media...: Dry chemical, carbon dioxide, or chemical foam

Special Fire Fighting: Procedures: Full emergency equipment with self-contained breathing apparatus. Pressure can build up in drums and other closed containers exposed to temperatures found in fires. A cold water stream should be directed to cool fire exposed containers.

V. HEALTH AND SAFETY INFORMATION

Human Effects: Acute

Inhalation.....: Respiratory tract irritation if mists are inhaled.

Skin.....: Generally regarded as a skin irritant.

Eyes.....: Corrosive to the eyes.

Ingestion.....: Can cause gastrointestinal irritation, nausea, vomiting, and diarrhea.

AEROFLEX BIO-WASH
JULY 8, 1987

V. HEALTH AND SAFETY INFORMATION CON'T.

Human Effects: Chronic

No chronic effects identified.

VI. EMERGENCY FIRST AID PROCEDURES

EYE CONTACT.....: Flush with clean lukewarm water (low pressure) for at least 15 minutes. Obtain prompt medical attention.

SKIN CONTACT.....: Remove contaminated clothing. Wash affected areas thoroughly with soap and water. Wash contaminated clothing thoroughly before reuse.

INHALATION.....: Remove to well ventilated area free from risk of further exposure. Treat symptomatically.

INGESTION.....: Can cause gastrointestinal irritation, nausea, vomiting and diarrhea. Consult a physician immediately.

AEROFLEX BIO-WASH
JULY 8, 1987

VII. EMPLOYEE PROTECTION RECOMMENDATIONS

- EYE PROTECTION.....: Wear Safety glasses preferably with side shields (or goggles).
- SKIN PROTECTION.....: As with all chemicals, good industrial hygiene requires the use of chemically resistant gloves. Wash thoroughly after handling.
- RESPIRATORY PROTECTION.....: An appropriate NIOSH approved respirator for organic vapor and mist must be worn if exposure is likely to exceed exposure limits (Section II). Observe OSHA regulations for respirator use (29CFR 1910.134)
- VENTILATION.....: Good general ventilation must be used. Local exhaust ventilation may be needed to control air contamination below recommended exposure limits.
- OTHER.....: Safety showers and eyewash stations should be available and clearly marked. Educate employees in the safe use of this product and related safety equipment.

VIII. REACTIVITY DATA

- STABILITY.....: Stable under normal conditions
- POLYMERIZATION.....: Hazardous polymerization may occur
- INCOMPATIBILITY.....: Acid strong oxidizing agents, polymerization
(Materials to avoid) catalysts such as aluminum chloride, heat and flame.
- HAZARDOUS DECOMPOSITION
PRODUCTS.....: Carbon monoxide, carbon dioxide

IX. SPILL OR LEAK PROCEDURES

IF MATERIAL IS SPILLED OR RELEASED:

Absorb on inert material and collect in suitable containers for disposal. Dike and contain. Avoid spills into sanitary sewers.

**ATTENTION
NEW MSDS****Section 1 Product Identification: ICC 757 GHOST/HAZE REMOVER****Section 2 Hazardous Ingredients:**

SODIUM HYDROXIDE (CAS Reg. #1310-73-2) has ACGIH TLV of 2mg/cubic meter as 8 hour time-weighted average(TWA) and OSHA PEL of 2mg/cubic meter;

CYCLOHEXANONE (CAS Reg. #108-94-1) has ACGIH TLV of 25ppm as 8 hour time-weighted average(TWA) and OSHA PEL of 50ppm.

Section 3 Physical Data:

INITIAL BOILING POINT: ~230 F. VAPOR PRESSURE: >3mmHg @ 20 C. VAPOR DENSITY: >1 (Air =1).

SPECIFIC GRAVITY: >1. WATER SOLUBLE: Yes. INITIAL EVAPORATION RATE: >1 (Water =1).

PERCENT VOLATILE: >23. SCAQMD RULE 1130: 0.88/gallon; 8 g/l. (Low solvent graphic arts material).

APPEARANCE: Viscous. ODOR: Distinctive. SCAQMD RULE 443.1: 337 g/l.

Section 4 Fire and Explosion Hazard Data:

NON-FLAMMABLE (Title 29 CFR 1910.106)

SPECIAL FIRE FIGHTING PROCEDURES: None.

UNUSUAL FIRE HAZARDS: None.

EXTINGUISHING MEDIA: Water; Class A, B or C Extinguisher.

FLASH POINT: ~108 F. (PMCC).

FLAMMABLE LIMITS: Upper 0~20%; Lower 0~2%.

NFPA 704 CODE SYSTEM RATING: Health 2; Flammability 2; Reactivity 0.

Section 5 Health Hazard Data:

NO carcinogenous components (NTP; IARC; OSHA)

EMERGENCY AND FIRST AID PROCEDURES:

SKIN: Rinse with water. Launder contaminated clothing before re-use.

EYES: Flush with water. Seek medical attention.

INGESTION: Rinse mouth. Drink water or milk. Seek medical attention.

INHALATION: If over-exposed, remove to fresh air.

EFFECTS OF OVEREXPOSURE: Can be drying, irritating or corrosive to skin, eyes, mucous membranes and open cuts. Excessive inhalation can cause nasal and respiratory irritation; dizziness, weakness, fatigue, nausea, headache, unconsciousness and asphyxiation.

PRIMARY ROUTES OF ENTRY: Eyes; skin; nose; mouth.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Respiratory illness; skin irritations and lacerations.

Section 6 Reactivity Data:

NO photochemically reactive solvents

STABILITY: Stable. INCOMPATIBILITY: Acidic material.

CONDITIONS TO AVOID: Open flame.

HAZARDOUS DECOMPOSITION PRODUCTS: Burning may produce CO and CO2.

HAZARDOUS POLYMERIZATION: Cannot occur.

Section 7 Spill or Leak Procedures:

DRAIN-SAFE (when used in accordance with directions)

STEPS TO BE TAKEN IF MATERIAL IS SPILLED: Wipe or mop. Water rinse.

WASTE DISPOSAL METHOD: Flush with water or neutralize with acid.

Section 8 Control Measures:

VENTILATION: Maintain adequate ventilation.

EYE PROTECTION: Splash-proof goggles.

RESPIRATORY PROTECTION: No special protective equipment required.

HAND PROTECTION: Chemically resistant gloves.

OTHER PROTECTIVE EQUIPMENT: None.

Section 9 Precautions for Safe Handling and Storing:

Containers should be kept closed when not in use. Do not contaminate with other material. Containers stored outdoors should have attached lids and covering; avoid storing in standing water. Do not reuse container.

INTERCONTINENTAL CHEMICAL CORPORATION believes that the data contained herein are factual and the opinions expressed are those of qualified experts. The data are not to be taken as a representation for which INTERCONTINENTAL CHEMICAL CORPORATION assumes legal responsibility. They are offered for your consideration and verification.

AUGUST 8, 1987

MATERIAL SAFETY DATA SHEET

INTERCONTINENTAL CHEMICAL CORPORATION
4660 SPRING GROVE AVENUE
CINCINNATI, OHIO 45232-1995
513/541-7100

Section 1 Product Identification: IOC 840

Section 2 Hazardous Ingredients:
NONE.

Section 3 Physical Data:

INITIAL BOILING POINT: ~240°F

WATER SOLUBLE: Complete.

VAPOR DENSITY: >1 (Air =1).

ODOR: Mild.

INITIAL EVAPORATION RATE: <<1 (Butyl Acetate =1).

VAPOR PRESSURE: <1 mmHg @ 20°C.

PERCENT VOLATILE: >55.

SPECIFIC GRAVITY: >1.

APPEARANCE: Creamy-white, sprayable liquid.

Section 4 Fire and Explosion Hazard Data:

NON-FLAMMABLE (Title 29 CFR 1910.106).

FLAMMABLE LIMITS: Not tested.

EXTINGUISHING MEDIA: Water; Class A, B, or C Extinguisher.

SPECIAL FIRE FIGHTING PROCEDURES: None.

NEPA 704 CODE SYSTEM RATING: Health 1; Flammability 2; Reactivity 0.

FLASH POINT: ~120°F. (PMOC).

FIRE HAZARDS: A combustible liquid.



Section 5 Health Hazard Data:

NO carcinogenous components (NTP; IARC; OSHA)

NON-TOXIC when used according to direction.

EMERGENCY AND FIRST AID PROCEDURES:

SKIN: Rinse with water. Launder contaminated clothing before re-use.

EYES: Flush with water. Seek medical attention if feeling of dryness exists.

INGESTION: Rinse mouth. Drink water or milk. Seek medical attention.

INHALATION: If over-exposed, remove to fresh air.

EFFECTS OF OVEREXPOSURE: May cause dryness to eyes, skin, mucous membranes.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Respiratory illness; eye irritation; skin irritations and lacerations.

PRIMARY ROUTES OF ENTRY: Eyes; skin; nose; mouth.

Section 6 Reactivity Data:

NO photochemically reactive solvents.

STABILITY: Stable.

INCOMPATIBILITY: Strong oxidizing agents.

CONDITIONS TO AVOID: Welding arcs, open flame.

HAZARDOUS POLYMERIZATION: Cannot occur.

HAZARDOUS DECOMPOSITION PRODUCTS: Burning may produce CO and CO₂.

Section 7 Spill or Leak Procedures:

DRAIN SAFE.

STEPS TO BE TAKEN IF MATERIAL IS SPILLED: Wipe or mop. Water rinse.

WASTE DISPOSAL METHOD: Small quantities, flush with water. Large quantities, use absorbant and dispose in accordance with local, State and Federal regulations.

Section 8 Control Measures:

VENTILATION: Maintain adequate ventilation.

EYE PROTECTION: Splash-proof goggles.

RESPIRATORY PROTECTION: No special protective equipment required.

HAND PROTECTION: Chemically resistant gloves.

OTHER PROTECTIVE EQUIPMENT: None.

Section 9 Precautions for Safe Handling and Storing:

Containers should be kept closed when not in use. Do not contaminate with other material. Containers stored outdoors should have caps (or bungs) closed and protective covering; avoid storing in standing water. Do not reuse container.

Section 10 Regulatory Information

Product contains the following chemical subject to the reporting requirements of SARA Title III Section 313 and 40 CFR 372 (Note: * indicates item is a trade secret):

Chemical or Category

CAS Reg.No.

Upper Bound % by Weight

NONE

INTERCONTINENTAL CHEMICAL CORPORATION believes that the data contained herein are factual and the opinions expressed are those of qualified experts. The data are not to be taken as a representation for which INTERCONTINENTAL CHEMICAL CORPORATION assumes legal responsibility. They are offered for your consideration and verification.

ICC 840 D#21 16.12.12

MAY 2, 1989

MATERIAL SAFETY DATA SHEET

Section 1: Product Identification. ICC 833

Section 2: Hazardous Ingredients.
ICC 833 is not a hazardous product.

Section 3: Physical Data.

Initial Boiling Point: -216°F .

Water Soluble: Complete.

Vapor Density: >1 (Air = 1).

Odor: Slight.

Initial Evaporation Rate: ~Water.

Vapor Pressure: ~Water.

Percent Volatile: >55 .

Specific Gravity: >1 .

Appearance: Clear, sprayable liquid.

SCAQMD Rule 1130: 0.07/gallon; 0g/L.

Section 4: Fire and Explosion Hazard Data.

NON-FLAMMABLE (Title 29 CFR 1910.106).

Flammable Limits: Not Applicable.

Extinguishing Media: Not Applicable.

Special Fire Fighting Procedures: None.

NFPA 704 Code System Rating: Health 0; Flammability 0; Reactivity 0.

Flash Point: None.

Fire Hazards: None.

Section 5: Health Hazard Data.

NON-TOXIC when used according to direction.

Emergency and First Aid Procedures:

Skin: Rinse with water. Launder contaminated clothing before reuse.

Eyes: Flush with water. Seek medical attention if irritation persists.

Ingestion: Rinse mouth. Drink water or milk. Seek medical attention.

Inhalation: If over-exposed, remove to fresh air.

Effects of Exposure: Can be drying, irritating to skin, eyes, mucous membranes, and open cuts.

Medical Conditions Aggravated by Exposure: Respiratory illness; skin irritation/lacerations.

Primary Routes of Entry: Eyes; skin; nose; mouth.

Section 6: Reactivity Data.

NO PHOTOCHEMICALLY REACTIVE SOLVENTS.

Stability: Stable.

Incompatibility: Not Observed.

Conditions to Avoid: Welding arcs.

Hazardous Polymerization: Cannot occur.

Hazardous Decomposition Products: Burning may produce acidic fumes, CO and CO₂.

Section 7:

Spill or Leak Procedures.

DRAIN-SAFE (when used in accordance with directions).

Steps to be Taken if Material is Spilled: Wipe or mop. Rinse with water.

Waste Disposal Method: Flush with water.

Section 8:

Control Measures.

Ventilation: Maintain adequate ventilation.

Eye Protection: Use splash-proof goggles with any chemical.

Respiratory Protection: No special protective equipment required.

Hand Protection: Chemically-resistant gloves recommended with any chemical.

Other Protective Equipment: None.

Section 9:

Precautions for Safe Handling and Storage.

Containers should be kept closed when not in use. Product should not be contaminated with other material. Containers stored outdoors should have bungs closed with protective covering. Avoid storing in standing water. Do not reuse container.

Section 10:

Regulatory Information.

Product contains no chemical subject to the reporting requirements of Title SARA III, Section 313 and 40 CFR 372.

Intercontinental Chemical Corporation believes that the data contained herein are factual and the opinions expressed therein are those of qualified experts. The data are not to be taken as a representation for which Intercontinental Chemical Corporation assumes legal responsibility. They are offered for your consideration and verification.



Design Original OHD 063989545

Juana Rojo to: FPusey

02/08/2011 05:17 PM

From: Juana Rojo/R5/USEPA/US
To: FPusey@design-original.com

Mr. Frank Pusey
Design Original

For the purpose of keeping all the environmental agencies' records straight and eventually public-noticing the completion of all corrective action activities at your facility /property, you should also notify Ohio EPA (OEPA) of your address correction, i.e., from 402 Jackson Street to 404 Jackson Street.

Please contact Harold O'Connell of OEPA at:

harold.oconnell@epa.state.oh.us

Thank you very much for your cooperation,

Juana Rojo

Tel: 312-886-0990 Fax: 312-692-2034
e-mail: rojo.juana@epa.gov



Design Original OHD 063989545
Change of Address
Juana Rojo to: FPusey

02/04/2011 03:52 PM

Mr. Frank Pusey
Design Original

RE: Change of Address
EPA Corrective Action Files OHD 063989545

Dear Mr. Pusey:

When EPA representatives Juana Rojo and Michelle Mullin were at your facility in late 2009, Mr. Don Faulder informed them that the facility's address had been legally change. The change was due to a request from the City.

Mr. Faulder stated that he would send an official notification to EPA. However, the EPA has not yet received said notification.

Mr. Pusey, would you kindly send your change of address notification. This is needed to update your files at the EPA files. The information can be faxed to 312-692-2034 to EPA to the attention of Juana Rojo, or to Hak Cho, Chief, Remediation and Reuse Branch #1, or at the address indicated below.

Thank you very much.

Juana E. Rojo
Corrective Action Project Manager
Remediation and Reuse Branch
U.S. EPA Region 5
77 W. Jackson Blvd. (LU-9J)
Chicago, Illinois 60604
Tel: 312-886-0990 Fax: 312-692-2034
e-mail: rojo.juana@epa.gov

Design Original OHD063989545 Change of Address

copy #1

Subject: Design Original OHD063989545 Change of Address**From:** Rojo.Juana@epamail.epa.gov**Date:** Fri, 4 Feb 2011 15:52:39 -0600**To:** FPusey@design-original.comMr. Frank Pusey
Design OriginalRE: Change of Address
EPA Corrective ActionFiles
OHD 063989545

Dear Mr. Pusey:

When EPA representatives Juana Rojo and Michelle Mullin were at your facility in late 2009, Mr. Don Faulder informed them that the facility's address had been legally change. The change was due to a request from the City.

Mr. Faulder stated that he would send an official notification to EPA. However, the EPA has not yet received said notification.

Mr. Pusey, would you kindly send your change of address notification. This is needed to update your files at the EPA files. The information can be faxed to 312-692-2034 to EPA to the attention of Juana Rojo, or to Hak Cho, Chief, Remediation and Reuse Branch #1, or at the address indicated below.

Thank you very much.

Juana E. Rojo
Corrective Action Project Manager
Remediation and Reuse Branch
U.S. EPA Region 5
77 W. Jackson Blvd. (LU-93)
Chicago, Illinois 60604
Tel: 312-886-0990 Fax: 312-692-2034
e-mail: rojo.juana@epa.gov

2/4/11

To: Juana E. Rojo

Physical Address: 404 Jackson St.

Frank Pusey

**U.S. Environmental Protection Agency Region 5
Chicago, Illinois**

Date: January 4, 2010

From: Juana E. Rojo *Juana E. Rojo*
Corrective Action Project Manager

To: File OHD063989545
402 Jackson Street
Jackson Center, Ohio 45334

Subject: Site Visit

On October 14, 2009, Juana Rojo and Michelle Mullin of the Remediation and Reuse Branch, Corrective Action Section 1, visited the Design Original facility in Jackson Center. The purpose of the visit was to gather information to update our files regarding the environmental status of the facility. This information would be used to evaluate completion of corrective actions at the facility.

Our tour of the facility and a discussion with Mr. Don Faulder, plant manager, did not uncover any new issue of concern regarding past or present releases of hazardous wastes or hazardous constituents at this facility. EPA records indicate that the facility was clean-closed in 1996. Illegal land disposal of toluene had occurred at the facility. The closure certification was approved by Ohio EPA (OEPA) in July 1996. [See this author's site visit summary of December 2001 regarding background information about this facility.] At present, the facility does not conduct any hazardous waste activities. It does not generate any hazardous waste because it changed the solvent used in its process from toluene to a citrus-derived solvent.

GW?

Mr. Faulder showed us the back of the building where the process is conducted. Design Original manufactures stitched embroidery and printed wearing apparel. The area was extremely clean, no signs of releases of ink or any other materials were observed. The ink used in the process is reused. Mr. Faulder stated that the operations have not changed since my last visit in 2001. [At that time I did not observe any releases inside the plant or outside.] He also indicated that no releases or disposal have occurred since the facility's cleanup in 1996.

GW

The only issue that apparently needs follow-up is a change of address. The facility itself has not moved. However, the City asked Design Original to correct the address to 404 Jackson Street. Design Original has been using 402 (rear, it seems) as the street number since they bought the property in 1988. The 402 number legally belongs to a Custom Polishing plant located in front of Design Original. I asked Mr. Faulder to report to EPA the address change. It appears that the company has not reported the address change to OEPA either.

GW?

Design Original achieved positive Corrective Action (CA) 725 and 750 Environmental Indicator determinations. Soil contamination with toluene was removed in 1996. Design Original met all the risk-based soil cleanup goals established by OEPA for direct contact exposure as well as for the protection of groundwater. However, I could not find actual groundwater data in our files for this facility. Harold O'Connell of the OEPA district office has indicated that his office does not have any groundwater data for this facility. However, historical information sent by OEPA to EPA indicates that a comprehensive groundwater monitoring of the (apparently temporary) wells installed at the Design Original facility found that the groundwater at this facility was not a concern.

WHERE?
↑

During our visit to Harold O'Connell's office on October 13, 2009, he stated that he has no evidence either of any environmental concern at Design Original. Once I receive the address change notification from Design Original, I believe that this project can be completed, i.e., a final determination can be public noticed. My conclusion is that no further RCRA corrective actions are needed at this facility.

Information due from Design Original: A notification for change of address.

Design Original Owner: Frank Pusey
Plant Manager: Don Faulder
Phone Number: 937-596-5121

Corrected Address: 404 Jackson Street
Jackson Center, OH 45334

copy 1



Design Originals

Michelle Mullin to: Juana Rojo

09/15/2009 12:59 PM

I also followed up with the Shelby County Auditor on the Design Originals site, and she had only this information: It is classified as a business with a PO Box # of 727 in Jackson Center, and the owner was listed as Frank Pusey, who has owned it since 1988. She recommended I call the Village of Jackson Center. The village had Custom Polishing listed as the owner at 402 Jackson Street. I called Custom Polishing at 937-596-0430 and left a voice mail. I also called Design Original at 937-596-5121. They stated that they have gone by the address of 402 forever, but their real address is 404. They are right behind Custom Polishing, and the property has not been sold for at least within the last 10 years. So, I think it is still the same property, with a wrong address.

Michelle Mullin
US EPA R5 Project Manager
LCD-Remediation and Reuse
Corrective Actions
LU-9J
312-353-2470

3/29/07

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: DESIGN ORIGINAL, INC.
Facility Address: 402 Jackson Street, Jackson Center, Ohio 45334
Facility EPA ID #: OHD 063 989 545

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X

If yes - check here and continue with #2 below.

If no - re-evaluate existing data, or

if data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND**Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

Page 2

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be “contaminated”¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		x		
Air (indoors) ²		x		
Surface Soil (e.g., <2 ft)		x		
Surface Water		x		
Sediment		x		
Subsurf. Soil (e.g., >2 ft)		x		
Air (outdoors)		x		

X If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

 If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

 If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

Soil was removed from an area highly contaminated with toluene (up to 47,000 ppm on the surface in one spot). Design Original met the cleanup concentration levels for soil specified by Ohio EPA for the hazardous constituents of concern (COCs). The COCs included lead and chromium, and the following organic constituents which had been used as solvents at the facility: toluene, methylene chloride, chlorobenzene, xylene, acetone, methyl isobutyl ketone, benzene, and ethyl benzene.

Soil was removed to a depth of at least 4 feet. In some areas, excavation and sampling was done at an approximate depth of 6 foot. The cleanup target concentration levels for the organic constituents were “non-detectable” levels (i.e., below detection limits). For lead and chromium, the cleanup concentration levels established by Ohio EPA were based on levels found in Ohio farm soils. These soil cleanup levels are at or below the current U.S. EPA’s risk-based screening levels for direct contact exposure as well as for protection of groundwater.

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

Current Human Exposures Under Control
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Design Original discontinued the use of toluene in its manufacturing process in 1988. Instead, Design Original currently uses a natural citrus-based solvent, which is safe to put in the drain, according to information provided by Design Original.

In 1989, the Ohio EPA also conducted a Comprehensive Ground-Water Monitoring Evaluation of the wells installed at Design Original and found that the groundwater quality at the facility was not a concern.

REFERENCES: Final Closure Certification Report for Design Original, Inc., June 25, 1996 (Lockwood Laboratories/Springfield Environmental, Inc.). It was received by Ohio EPA on July 3, 1996, and it was approved on July 25, 1996.
Preliminary Assessment/Visual Site Inspection Report, September 1993 (Metcalf & Eddy consultants).
U.S. EPA Site Visit Report dated December 12, 2001.

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Page 4

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater		—	—	—			
Air (indoors)	—	—	—				
Soil (surface, e.g., <2 ft)	—	—	—	—	—	—	—
Surface Water	—	—			—	—	—
Sediment	—	—			—	—	—
Soil (subsurface e.g., >2 ft)				—			—
Air (outdoors)	—	—	—	—	—		

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.
2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- ___ If no (pathways are not complete for any contaminated media-receptor combination) - supporting documentation skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).
- ___ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.
- ___ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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Page 5

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

_____ Rationale and Reference(s):

⁴ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

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Page 6

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

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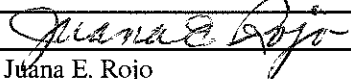
6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):


 X

YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the *Design Original, Inc.*, facility, EPA ID # *OHD 063 989 545*, located at *402 Jackson Street, Jackson Center, Ohio 45334*, under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

NO - "Current Human Exposures" are NOT "Under Control."

IN - More information is needed to make a determination.

Completed by	(signature)		Date	<i>3/26/07</i>
	(print)	Juana E. Rojo		
	(title)	Corrective Action Project Manager		

Supervisor	(signature)		Date	<i>3/29/07</i>
	(print)	Hak K. Cho		
	(title)	Chief, Corrective Action Section		
	(EPA Region or State)	U.S. EPA, Region 5		

Locations where References may be found:
<i>Closure documents, general information about the facility, and 12/01 U.S. EPA Site Visit Report: RCRA Records Center, 77 West Jackson Blvd., Chicago, IL 60604.</i>
<i>Comprehensive Ground-Water Monitoring Evaluation: Ohio EPA Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911.</i>

Contact telephone and e-mail numbers

(name)	Juana E. Rojo
(phone #)	312-886-0990
(e-mail)	rojo.juana@epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: DESIGN ORIGINAL, INC.
Facility Address: 402 Jackson Street, Jackson Center, Ohio 45334
Facility EPA ID #: OHD 063 989 545

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

☒ If yes - check here and continue with #2 below.
☐ If no - re-evaluate existing data, or
☐ if data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains **ONLY** to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database **ONLY** as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

Page 2

2. Is **groundwater** known or reasonably suspected to be "**contaminated**"¹ above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

_____ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

X

_____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

_____ Rationale and Reference(s):

The groundwater at Design Original was examined in the late 1980's, based on the statements of both, Frank Pusey, owner of Design Original, and Harold O'Connell of the Ohio EPA. Correspondence from Ohio EPA contained in U.S. EPA files indicates that in 1989, the Ohio EPA conducted a Comprehensive Ground-Water Monitoring Evaluation of the wells installed at Design Original and found that the groundwater quality at the facility was not a concern. In addition, all contaminated soils were removed from the facility.

Design Original met the all the soil cleanup target levels specified by Ohio EPA for the following list of constituents of concern: toluene, methylene chloride, chlorobenzene, xylene, acetone, methyl isobutyl ketone, benzene, ethyl benzene, lead, and chromium. The cleanup target levels for the organic constituents were "non-detectable" levels (i.e., below detection limits). The lead and chromium cleanup levels established by Ohio EPA were based on levels found in Ohio farm soils. These levels are at or below the current U.S. EPA's risk-based levels for the protection of groundwater. On July 25, 1996, Ohio EPA concluded that Design Original, Inc., had met the standards proposed in its revised closure plan, as approved on May 10, 1996. The plan did not require groundwater sampling as it was deemed not to be necessary.

REFERENCES:

*Final Closure Certification Report for Design Original, Inc., June 25, 1996 (Lockwood Laboratories/Springfield Environmental, Inc.) approved by Ohio EPA on July 25, 1996, and related correspondence and memoranda from Ohio EPA. Southwest District Office files.
(U.S. EPA) Site Visit Report dated December 12, 2001.*

¹ "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate levels (appropriate for the protection of the groundwater resource and its beneficial uses).

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA 750)

Page 3

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?

_____ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"²).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

_____ Rationale and Reference(s):

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (750)

Page 4

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

_____ If yes - continue after identifying potentially affected surface water bodies.

_____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

_____ Rationale and Reference(s):

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRCIS code (CA 750)

Page 5

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

_____ Rationale and Reference(s):

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA 750)**

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6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter “IN” status code.

_____ Rationale and Reference(s):

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA 750)

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

_____ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

_____ If no - enter "NO" status code in #8.

_____ If unknown - enter "IN" status code in #8.

_____ Rationale and Reference(s):

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA 750)**

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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

 X

YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the **Design Original, Inc.**, facility, EPA ID #OHD 063 989 545, located at **402 Jackson Street, Jackson Center, Ohio 45334**. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

Completed by	(signature)	<i>Juana E. Rojo</i>	Date	<i>3/26/07</i>
	(print)	Juana E. Rojo		
	(title)	Corrective Action Project Manager		

Supervisor	(signature)	<i>Hak K. Cho</i>	Date	<i>3/29/07</i>
	(print)	Hak K. Cho		
	(title)	Chief, Corrective Action Section		
	(EPA Region or State)	U.S. EPA, Region 5		

Locations where References may be found:
Closure documents, general information about the facility, and 12/01 U.S. EPA Site Visit Report: RCRA Records Center, 77 West Jackson Blvd., Chicago, IL 60604
Complete <i>Comprehensive Ground-Water Monitoring Evaluation Reports</i> : Ohio EPA Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911.

Contact telephone and e-mail numbers

(name)	Juana E. Rojo
(phone #)	312-886-0990
(e-mail)	rojo.juana@epa.gov

U.S. EPA Environmental Protection Agency, Region 5
Chicago, Illinois

December 12, 2001

Project Manager: Juana E. Rojo

Juana E. Rojo

Facility: **Design Original, Inc.-OHD 063 989 545**

402 Jackson Street
Jackson Center, Ohio 45334

On October 18, 2001, Juana Rojo of the Waste Management Branch (WMB), Corrective Action Section, visited the Design Original facility in Jackson Center, Ohio. The U.S. EPA had informed the facility's owner about the site visit on a letter dated October 10, 2001. The purpose of the visit was to evaluate the environmental status of the facility. The updated status information would serve to determine if the facility required additional corrective actions. If corrective actions had been found to be necessary, the U.S. EPA would have then presented to the facility the option to perform remedial activities by means of a Voluntary Corrective Action Agreement.

GR

Mr. Frank Pusey, the Design Original owner gave me a tour of the facility. The Solid Waste Management Units (SWMUs) and areas of concern identified in previous site visits were visually inspected. I did not see any area at the Design Original facility that would warrant corrective actions at this time.

GW?

It should be noted that Harold O'Connell of the Ohio EPA, Southwest District Office sent me copies of several documents regarding the closure activities that were conducted at the Design Original facility from 1995 to 1996. These documents contain sampling data and other additional information that were also very helpful in my evaluation regarding the need for further corrective actions at the facility. Specifically, Mr. O'Connell sent me copies of the closure plan, final closure report, and several closure-related memos. These documents were added to the U.S. EPA files on this facility.

GW?

Facility Status: Design Original is an exempt small quantity generator of hazardous waste. In the past, the main chemical constituent of environmental concern in the company's manufacturing process was toluene. The company disposed of toluene and other solvents at an illegal land disposal area at the plant. Currently, Design Original has not used toluene since 1988. During my site visit on October 18, 2001, I did not see any hazardous waste management unit or operation. The place looks clean. There is a dumpster in the backyard which does not look like a waste management unit of concern.

GW?

*C.A.
vs*

CLOSURE

Background Information: Design Original manufactures stitched embroidery and printed wearing

apparel. The process involves silk screening. The silk screening process utilizes solvent-based inks. The manufacturing operations are housed in a one story building built on a concrete slab. Possibly from October 1984 to September 1987 Design Original used an area adjacent to the west side of the building as a land-disposal unit for the illegal release of toluene. A fire at the facility in September 1987, appeared to have caused additional releases of toluene. As a result of these and other violations of the Ohio's Hazardous Waste Rules, including accusations of falsification of records, Design Original was the focus of a criminal investigation in 1989. The President of the company, Frank Pusey, was sentenced to 120 days in the Shelby County jail. In response to enforcement actions initiated by the Ohio EPA (OEPA), Design Original prepared a closure plan for the illegal land disposal area in 1995.

In September 1993, Metcalf & Eddy, Inc., conducted, on behalf of the U.S. EPA, a RCRA Facility Assessment (RFA) at the Design Original facility. The RFA identified and evaluated two SWMUs of concern and one AOC. I have also reviewed the closure documentation submitted by OEPA to U.S. EPA in November 2001, regarding the July 1996 closure of the land disposal area (identified as SWMU 1). On my site visit on October 18, 2001, I inspected the areas where the two SWMUs and the AOC had been located. These areas of concern are discussed below.

SWMU 1: An un-permitted land-disposal facility. As it was discussed above, this area was closed as a hazardous waste management unit in 1996. The closure encompassed an area approximately 48 by 18 feet. Closure of the area included removal of soil to a depth of at least 4 feet. In some areas excavation and sampling was done at deeper levels. The cleanup target levels to be met for toluene and 8 additional organic constituents of concern were "non-detectable" levels (i.e., below detection limits). The lead and chromium cleanup levels established by the OEPA for Design Original were based on levels found in Ohio farm soils. These levels are compatible with the current U.S. EPA's PRG levels for protection of groundwater. Sampling conducted after the removal of 100 cubic yards of contaminated soils indicated that all the target cleanup levels had been successfully met. During the site visit I observed that this SWMU 1 has now been covered by a new addition to the manufacturing building. A new wall was built (after closure) on the spot where the toluene had been disposed of. In general, the soils around the facility look clean, and in most cases they are covered with gravel.

Documentation in our files indicate (no data was included) that the OEPA conducted a Comprehensive Ground-Water Monitoring Evaluation at Design Original in 1989 and that the results showed that the groundwater quality at the facility was not a concern.

SWMU 2: Dumpster Area. The unit apparently operated during 1980s. Currently, this area is not environmentally significant. The area looks well managed, and the president of the company, Frank Pusey, said that they do not place any waste contaminated with hazardous waste or hazardous constituents in the dumpster currently in use.

AOC: Equipment Cleaning Area. The process of cleaning the screens with solvents (mainly with toluene) had been conducted in this area from 1981 through the summer of 1988. This area is not used any longer for that purpose. It is clean and there is no sign of contamination. According to Mr. Pusey, the workers currently clean the screens with a substance made of orange peel (i.e., acetic acid). The process is done at the presses. The liquids are "drain safe." The inks are reused.

Conclusions and Recommendations: I did not see any area at the Design Original facility that would warrant any corrective actions at this time. The only area of real concern in the past, the illegal land disposal area, has been closed for years. The closure plan was approved by OEPA on May 10, 1996, after several revisions. On July 3, 1996, Design Original submitted a closure certification document. This was approved by the OEPA on July 25, 1996. [The certification inspection had been conducted by OEPA on July 17, 1996.] The cleanup levels used by OEPA have been found to be consistent with current risk-based standards. The two other areas of concern observed in 1989 and 1993, the dumpster area and the equipment cleaning area, do not even exist any longer. No new areas of concern were discovered during my site visit. A voluntary corrective action agreement is not applicable to this facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DW-8J

OCT 10 2001

CERTIFIED MAIL: 7099 3400 0000 9585 1495

RETURN RECEIPT REQUESTED

Frank Pusey, President
Design Original, Inc.
402 Jackson Street
Jackson Center, Ohio 45334-0813

Re: RCRA Corrective Action Evaluations
Design Original, Justice Center, Ohio
OHD 063 989 545

Dear Mr. Pusey:

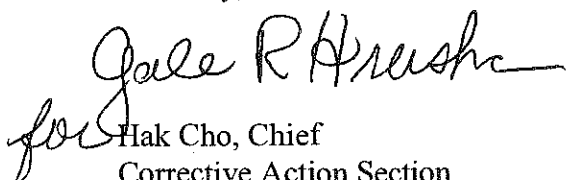
The United States Environmental Protection Agency (U.S. EPA) has conducted an evaluation of the Agency's Resource Conservation and Recovery Act (RCRA) corrective action files. Your facility, Design Original, Inc., located in Justice Center, Ohio, is shown as being potentially subject to either Sections 3004(u) or 3008(h) of RCRA. We have found historical documents indicating areas at your facility where corrective action may be required to address releases of hazardous wastes and/or constituents from solid waste management units (SWMUs) and/or Areas of Concern (AOCs). There is also documentation which indicates that remedial activities may have addressed issues of environmental concern at some of those areas. However, as this information is fairly dated, the U.S. EPA would like to meet with you and perform a visual site inspection of your facility to help determine its environmental status. This effort is being initiated in order to ensure that your facility does not pose an environmental hazard to human health or the environment.

The updated status information will serve as part of our determination of the next steps we must take. If environmental concerns have been satisfactorily addressed through past remedial activities, your facility will be classified as requiring no further corrective action. However, in the event that environmental issues requiring corrective action remain and these issues are not currently being addressed, we would present you with options to perform remedial activities. These options include addressing corrective action via a Voluntary Corrective Action agreement with the agency or through issuance of a RCRA 3008(h) order from our Enforcement and Compliance Assurance Branch.

We would like to schedule a meeting with you or an appropriate facility representative for the 18th or 19th of October 2001, to discuss these topics. Ms. Juana Rojo will be contacting you in order to schedule the date for this site visit. Your cooperation and assistance will enable her to establish the best possible understanding of the environmental condition of your facility.

Please contact Ms. Rojo of my staff at (312) 886-0990 if you have questions.

Sincerely,

The signature is written in cursive and appears to read "Gale R. Hruska".

Hak Cho, Chief
Corrective Action Section
Waste, Pesticides and Toxics Division

cc: Edwin Y. Lim, Ohio Environmental Protection Agency (OEPA)
Harold O'Connell, Southwest District Office, OEPA